



CITY OF LOS ANGELES  
DEPARTMENT OF CITY PLANNING  
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

# Sustainable Communities Environmental Assessment

## Main Street Tower Project

Case Number: ENV-2018-7379-SCEA  
ZA-2018-7378-ZV-TDR-SPR & VTT-82463

**Project Location:** 1123-1161 S. Main Street and 111 W. 12<sup>th</sup> Street, Los Angeles, CA 90015

**Community Plan Area:** Central City

**Council District:** 14 – Kevin de León

**Project Description:** The Proposed Project would result in the demolition of four existing commercial/retail buildings (a total of approximately 28,110 square feet of floor area) and surface parking lot and the new construction, use, and maintenance of a 30-story (340 feet above grade) mixed-use building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail uses. The Proposed Project would include a four-story above grade parking podium with ground floor retail/commercial uses and an amenity deck and a 26-story residential tower above the amenity deck. The Proposed Project would provide a total of 373 vehicle parking spaces and 195 bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC) requirements. Primary vehicular access for residential and commercial uses would be provided from Main Street and from the adjacent alley. The Proposed Project would provide approximately 39,601 square feet of open space pursuant to the LAMC requirements. In total, the Proposed Project would include 343,447 square feet of total floor area resulting in a floor area ratio (FAR) of 7.03:1. The Proposed Project would remove nine (9) existing non-protected street trees in the right-of-way surrounding the Project Site: eight (8) trees along Main Street and one (1) tree along 12<sup>th</sup> Street. The Proposed Project would require approximately 5,434 cubic yards (cy) of soil to be exported and 5,434 cy of soil to be imported to/from the Project Site.

The Project's discretionary requests include: (1) Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82463 to create one master ground lot for a mixed-use project containing 363 residential units and for the export of approximately 5,434 cubic yards of soil; (2) Pursuant to LAMC Section 12.27, a Zone Variance to permit 100 percent of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard spaces; (3) Pursuant to LAMC Section 14.5.7, a Transfer of Floor Area Rights (TFAR) for a transfer of 49,999 square feet of floor area to allow a total floor area of 343,447 square feet with a Floor Area Ratio (FAR) of 7.03:1; and (4) Pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates, or results in an increase of 50 or more dwelling units. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements.

**PREPARED FOR:**  
The City of Los Angeles  
Department of City  
Planning

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LLC

September 2021

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- C.2. Dudek, Archaeological Resources Recommendations for the Main Street Tower Project, Los Angeles, California, March 2019.

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- E.2 Geotechnologies, Inc., Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Tower, 1123 through 1161 South Main Street, Los Angeles, California, December 19, 2018.
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- G.2 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, 1147-1151 South Main Street, Los Angeles, California 90015, November 13, 2018.
- G.3 Andersen Environmental, Phase I Environmental Site Assessment Report, 1155 and 1165 South Main Street, Los Angeles, California 90015, March 14, 2014.
- G.4 Andersen Environmental, Phase II Environmental Site Assessment Report, 1155 & 1165 South Main Street, Los Angeles, CA 90015, May 28, 2014.
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- Crain & Associates, Main Street Tower, 1123-1161 S. Main Street, Supplemental Vehicle Miles Traveled Analysis, November 21, 2019.

J.2: Non-CEQA Transportation Analysis

- City of Los Angeles Department of Transportation (LADOT) Interdepartmental Correspondence Re: Transportation Impact Assessment For The Proposed Mixed-Use Project At 1123 – 1161 South Main Street (ENV-2018-7379-EAF/VTT-82463/ZA- 2018-7378-ZV-TDR-SPR), DOT Case No. CEN18-47813, July 22, 2019.
- Crain & Associates, Transportation Impact Study for the Proposed Main Street Tower Project, City of Los Angeles, April 9, 2019.

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Dudek, Tribal Cultural Resources Report for the Main Street Tower Project, City of Los Angeles, Los Angeles County, California, September 2021.

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# Section 1. Introduction

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This Sustainable Communities Environmental Assessment (SCEA) has been prepared for the Main Street Tower Project pursuant to Section 21155.2 of the California Public Resources Code (PRC).

## 1.1 Purpose of Environmental Review

CEQA was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study (IS) is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the Lead Agency may adopt a Negative Declaration (ND), a Mitigated Negative Declaration (MND) or a Sustainable Communities Environmental Assessment (SCEA), if the projects meets the criteria identified in PRC § 21155.

An application for the Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the Project is subject to CEQA, and the preparation of a SCEA is required.

## 1.2 Background Information on Senate Bill 375 and the SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as "The Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate regional land use and transportation planning in order to help meet the State's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations 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). 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 metropolitan planning organization 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). The 2016-2040 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern within the SCAG region, including achieving CARB's GHG reduction goals. For the SCAG region, CARB has set GHG emissions reduction targets at 8 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 on June 28, 2016, CARB officially determined that the 2016-2040 RTP/SCS would achieve CARB's 2020 and 2035 GHG emission reduction targets. These targets 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.

On September 3, 2020, SCAG's Regional Council approved and adopted the Connect SoCal plan (2020–2045 RTP/SCS) which, similar to the 2016-2040 RTP/SCS, sets forth goals, policies, and programs intended to reduce greenhouse gas emissions, improve active transportation, and promote development near existing transportation networks. For the SCAG region, CARB revised its long-range GHG emissions reduction target at 19 percent below 2005 per capita emissions levels by 2035, which the 2020-2045 RTP/SCS intends to meet or exceed. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target.

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 RTP/SCS. Acting as Lead Agency, the City of Los Angeles Department of City Planning required preparation of this SCEA to consider the potential project-specific and cumulative environmental impacts of the Proposed Project. This SCEA includes the same substantive environmental analysis as provided in an Initial Study/Mitigated Negative Declaration (IS/MND), but also includes additional discussion and analysis demonstrating that the Proposed Project meets the criteria for a Transit Priority Project (TPP) that qualifies for CEQA streamlining under SB 375.

### **1.3 Transit Priority Project Criteria**

SB 375 provides CEQA streamlining benefits to qualifying TPPs. For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see PRC § 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 2020-2045 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.

#### **1.4 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 (i.e., SCAG's 2020-2045 RTP/SCS Program EIR) 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.

## 1.5 Required Findings

Based on the review of the entire administrative record, the City of Los Angeles finds that preparation of a SCEA in accordance with PRC Section 21155.2(b) is appropriate for the Proposed Project for the following reasons:

1. The Proposed Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in SGAG's Connect SoCal 2020-2045 RTP/SCS;
2. The Proposed Project qualifies as a transit priority project (TPP) pursuant to PRC Section 21155(b);
3. The Proposed Project is a residential mixed-use project as defined by PRC Section 21159.28(d);
4. The Proposed Project, as mitigated, incorporates all relevant and feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including SCAG's 2020-2045 RTP/SCS Program EIR;
5. 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;
6. The Proposed Project, as mitigated, either avoids or mitigates to a level of insignificance all potentially significant or significant effects of the Proposed Project required to be analyzed pursuant to CEQA; and
7. An Initial Study has been prepared in accordance with CEQA (PRC § 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

## 1.6 Organization of the SCEA

This SCEA is organized into eight sections as follows:

Section 1. Introduction: This section provides an overview of the SCEA and CEQA process.

Section 2. Project Description: This section provides a detailed description of the Project Site location, the existing environmental setting and the Proposed Project, including details involving the proposed land uses, developed floor area, building height, vehicle parking, bicycle parking, open space areas, landscaping, signage, construction activities, and the associated land use entitlement requests.

Section 3. SCEA Criteria and Transit Priority Project Consistency Analysis: This section identifies the Transit Priority Project Criteria and provides an analysis of the Proposed Project's consistency with SCAG's Connect SoCal (2020-2045 RTP/SCS).

Section 4. Connect SoCal Program EIR Mitigation Measures: This section identifies all feasible mitigation measures, performance standards, and criteria from the Connect SoCal Program EIR.

Section 5. SCEA Initial Study Checklist: This section provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment. This section also contains the completed SCEA Initial Study Checklist showing the significance level under each environmental impact category.

Section 6. Sustainable Communities Environmental Analysis: Each environmental issue identified in the SCEA Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to a less than significant level. This section also identifies mitigation measures from the Connect SoCal Program EIR that are applicable to the Proposed Project.

Section 7. Preparers and Persons Consulted: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

Section 8. References, Acronyms, and Abbreviations: This section provides a list of reference materials and identifies commonly used acronyms and abbreviations that are used throughout the document.

Appendices: This section includes various reference documents, technical reports, and information used in the SCEA.

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## Section 2. Project Description

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### A. Project Summary

The Proposed Project would result in the demolition of four existing commercial/retail buildings (a total of approximately 28,110 square feet of floor area) and surface parking lot and the new construction, use, and maintenance of a 30-story (340 feet above grade) mixed-use building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail uses. The Proposed Project would include a four-story above grade parking podium with ground floor retail/commercial uses and an amenity deck and a 26-story residential tower above the amenity deck. The Proposed Project would provide a total of 373 vehicle parking spaces and 195 bicycle parking spaces in accordance with the Los Angeles Municipal Code (LAMC) requirements. Primary vehicular access for residential and commercial uses would be provided from Main Street and from the adjacent alley. The Proposed Project would provide approximately 39,601 square feet of open space pursuant to the LAMC requirements. In total, the Proposed Project would include 343,447 square feet of total floor area resulting in a floor area ratio (FAR) of 7.03:1. The Proposed Project would remove nine (9) existing non-protected street trees in the right-of-way surrounding the Project Site: eight (8) trees along Main Street and one (1) tree along 12<sup>th</sup> Street. The Proposed Project would require approximately 5,434 cubic yards (cy) of soil to be exported and 5,434 cy of soil to be imported to/from the Project Site.

The Project's discretionary requests include:

- (1) Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82463 to create one master ground lot for a mixed-use project containing 363 residential units and for the export of approximately 5,434 cy of soil and import of approximately 5,434 cy of soil;
- (2) Pursuant to LAMC Section 12.27, a Zone Variance to permit 100 percent of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard spaces;
- (3) Pursuant to LAMC Section 14.5.7, a Transfer of Floor Area Rights (TFAR) for a transfer of 49,999 square feet of floor area to allow a total floor area of 343,447 square feet with a Floor Area Ratio (FAR) of 7.03:1; and
- (4) Pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates, or results in an increase of 50 or more dwelling units.

The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not

limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements.

## B. Environmental Setting

### 1. Project Location

The Project Site is located in the Central City Community Plan area within the City of Los Angeles (City). The Project Site’s location within the City and the greater Los Angeles region is depicted in Figure 2.1, Project Location Map. The Project Site encompasses eight parcels and includes approximately 48,908 square feet of gross lot area (1.12 acres) and approximately 46,874 square feet of lot area after dedications (1.07 acres). The Project Site is generally bound by 12<sup>th</sup> Street to the south; Main Street to the east; a surface parking lot to the north; and an alleyway to the west. The Project Site’s property addresses, Assessor’s Parcel Numbers (APN), land use and lot area are summarized in Table 2.1, Summary of the Project Site, below.

**Table 2.1**  
**Summary of Project Site**

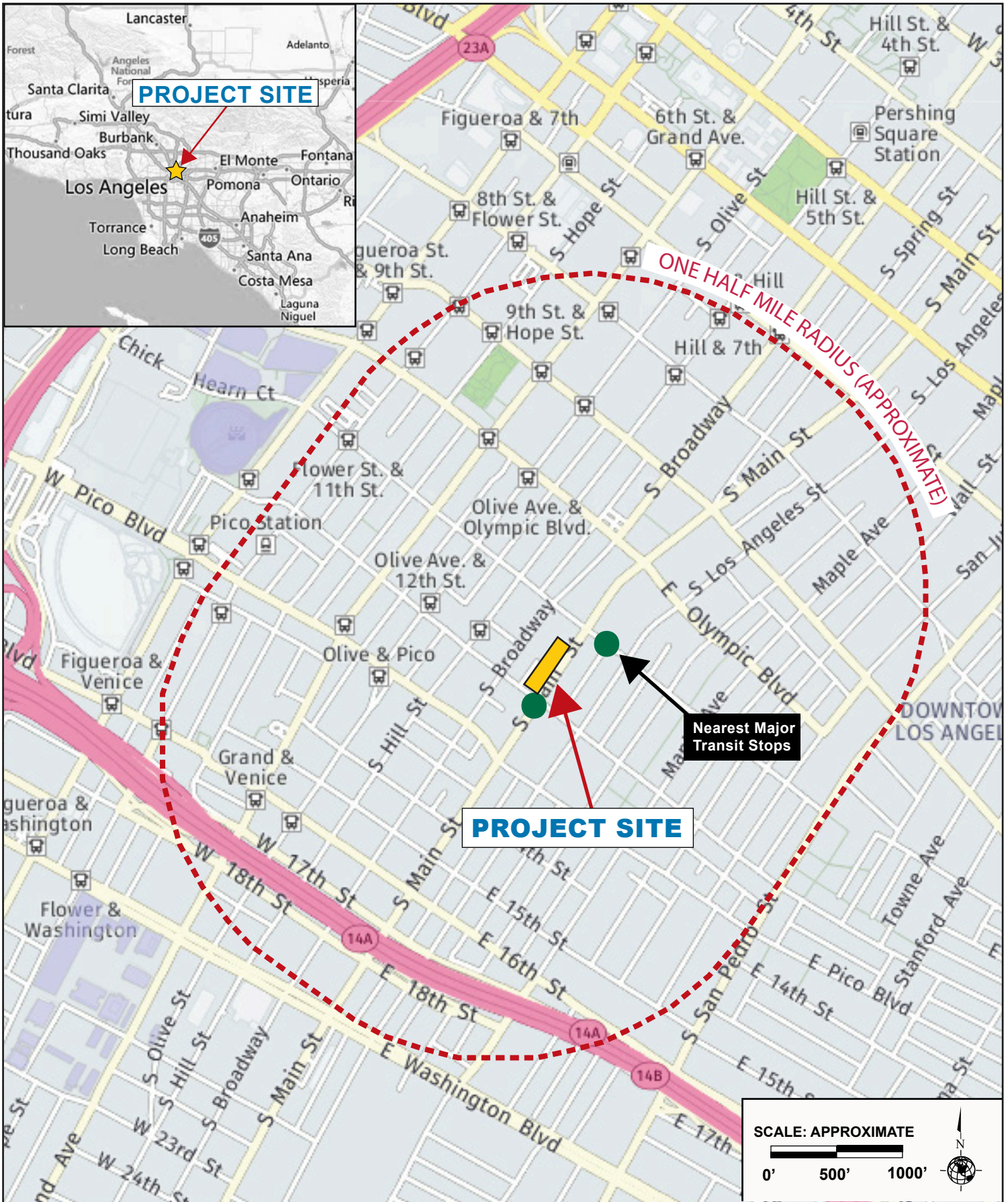
Address	APN	Existing Land Use	Lot Area (square feet)
1123 S. Main Street	5139-017-029	Surface parking lot	48,908 sf
1127 S. Main Street		Surface parking lot	
1129 S. Main Street			
1131 S. Main Street			
1135 S. Main Street			
1137 S. Main Street			
1139 S. Main Street			
1147 S. Main Street	5139-017-018	Single-story commercial building	
1151 S. Main Street	5139-017-017	Single-story commercial building	
1155 S. Main Street	5139-017-016	Single-story commercial building	
1159 S. Main Street	5139-017-015	Single-story commercial building	
1161 S. Main Street			
111 W. 12 <sup>th</sup> Street			

*Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: <http://zimas.lacity.org/>, accessed February 2019.*

Regional access to the Project Site is provided by the Pasadena/Harbor Freeway (I-110/SR 110), located approximately 0.75 miles to the west; the Hollywood Freeway (US - 101), located approximately 1.5 miles to the north; and the Santa Monica Freeway (I-10) located approximately 0.4 miles to the south. These three freeways also provide access to the Golden State/Santa Ana Freeway (I-5) to the north, the San Bernardino Freeway (I-10), and the Pomona Freeway (SR-60) to the east and southeast, respectively.



Local street access is provided by the grid roadway system surrounding the Project Site. The City's General Plan and Mobility Plan classify street designations in the Project vicinity. S. Main Street is a north-southbound street and borders the Project Site to the east. It is a two-way street providing one to two travel lanes in each direction (depending on street parking restrictions) and is classified as a Modified Avenue I in the City's Mobility Plan. On-street meter parking is provided with some restrictions. E. 12<sup>th</sup> Street is a one-way eastbound street, located immediately south of the Project Site. It provides two lanes and is classified as a Modified Collector Street in the City's Mobility Plan. E. 11<sup>th</sup> Street is a one-way westbound street and located approximately 180 feet north of the Project Site. It provides two travel lanes in the vicinity of the Project Site and is classified as a Modified Collector Street in the City's Mobility Plan. On-street metered parking is provided with some restrictions. S. Broadway is a north-southbound street located approximately 120 feet to the west of the Project Site. It provides two travel lanes in each direction and is classified as a Modified Avenue II roadway in the City's Mobility Plan.



Source: Yahoo Maps, 2019.



Figure 2.1  
Project Location Map

## Transit Priority Area

In 2013, the State of California enacted Senate Bill 743 (SB 743), which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “Transit Priority Area” as an area within one-half mile of a Major Transit Stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “Major Transit Stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21061.3 defines an “Infill Site” as a lot located within an urban area that has been previously developed with qualified urban uses, 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. As state law, SB 743 supersedes the aesthetic impact thresholds in the *CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading,<sup>1</sup> and nighttime illumination.

The Project Site is an infill site within a Transit Priority Area (TPA) as defined by CEQA because it is within one half-mile of a major, existing transit stop as defined by CEQA (Public Resource Code (PRC) Section 21099(a)(7)).<sup>2</sup> The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus (BBB), and the City of Gardena (GTrans). The Project Site’s proximity to the Pico Rail Station, approximately 0.6 mile west, and the 7<sup>th</sup> Street / Metro Center Station, approximately 0.9 mile north, provide transfer opportunities to other Metro rail services such as, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a “reasonable walking distance” (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Due to its proximity to the aforementioned bus stops and Pico Rail Station, the Project Site is easily accessible and highly connected with the City and the greater Los Angeles area.

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<sup>1</sup> *CEQA Guidelines Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The L.A. CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued ZI No. 2452, confirming that SB 743 applies to a project’s aesthetic impacts, including shade and shadow impacts.*

<sup>2</sup> *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](http://www.zimas.lacity.org), accessed February 2019.*

## 2. Existing Conditions

### 2.1 Zoning and Land Use Designations

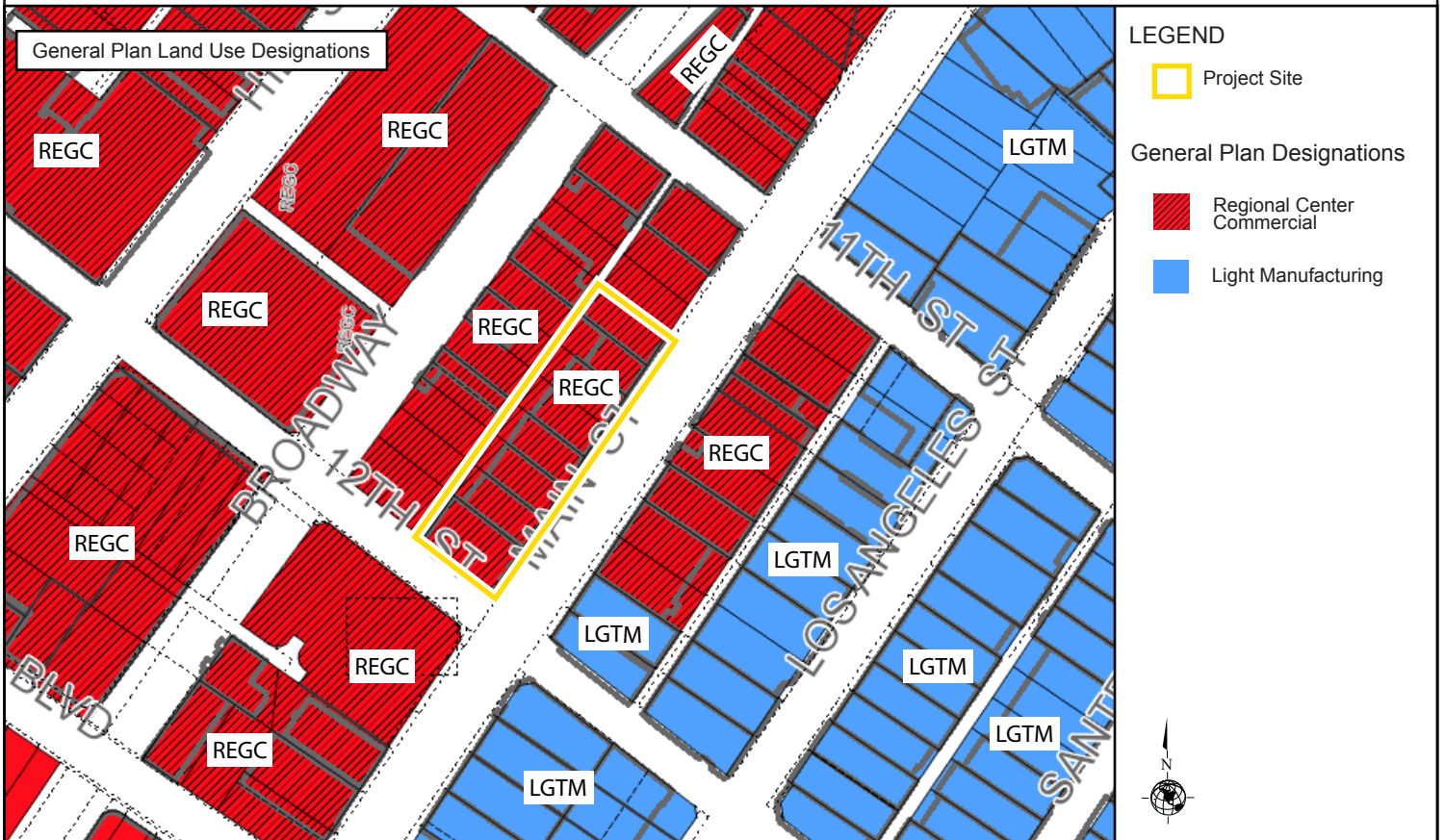
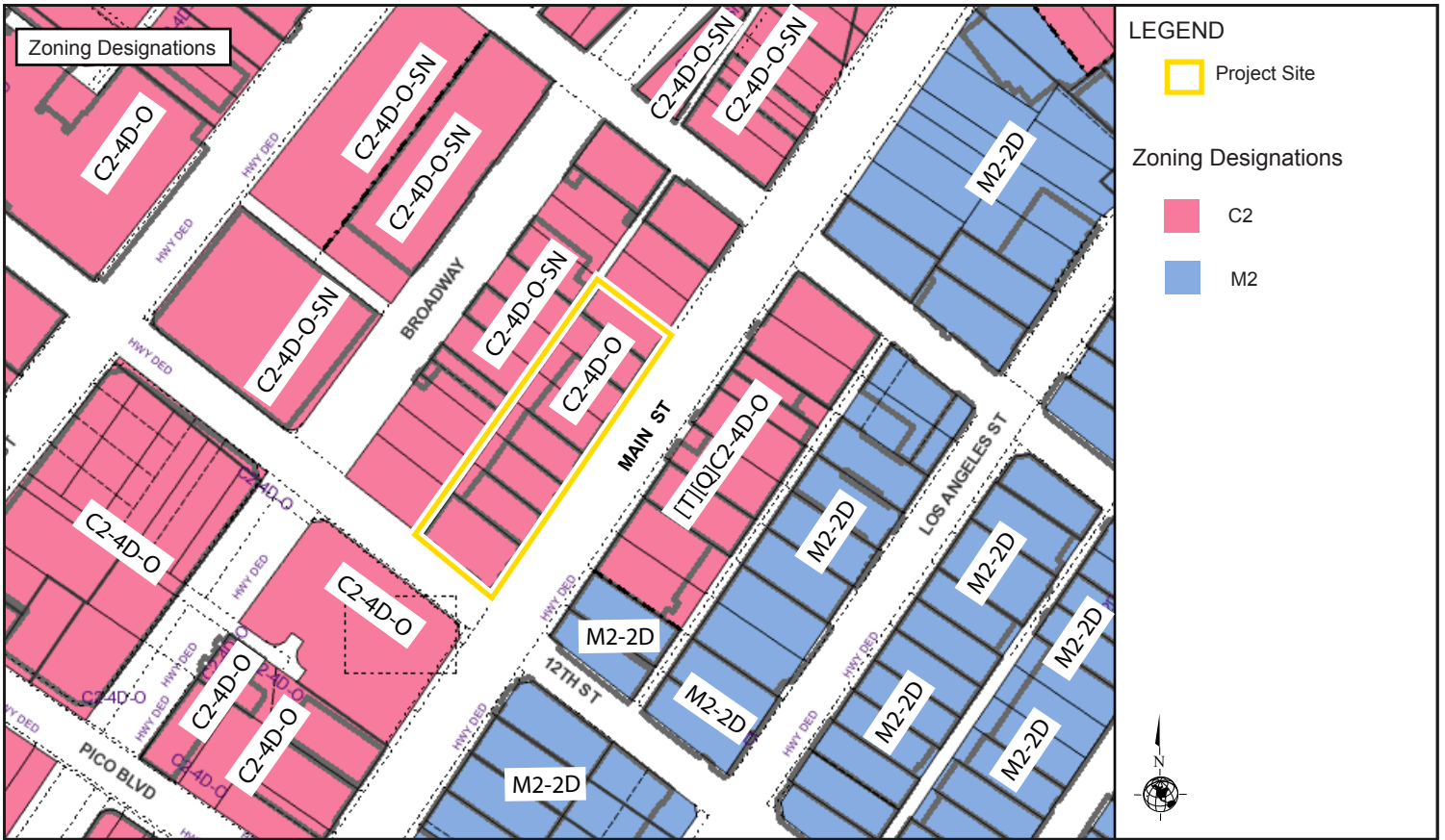
Figure 2.2, Zoning and General Plan Designations, shows the existing and proposed zonings and land use designations on the Project Site and in the surrounding area. The zoning designation for the Project Site is C2-4D-O (Commercial Zone) with a General Plan Land Use Designation of Regional Center Commercial. The zones corresponding to the Regional Center Commercial designation includes the CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4 zones. The Project Site is located in Height District No. 4, which has unlimited height, but limits development to an allowable FAR of 13:1. However, the “D” limitation limits FAR to a maximum of 6:1 and states that additional FAR may be obtained through Transfer of Floor Area. The “D” limitation for the Project Site reads as follows:

*The total floor area contained in all buildings on a lot shall not exceed six (6) times the buildable area of the lot, except for the following: (a) Projects approved under Section 418 (Transfer of Floor Area) of the Redevelopment Plan for the Central Business District Redevelopment Plan; (b) Projects approved under Section 415 (Rehabilitation and/or Remodeling of Existing Buildings) or Section 416 (Replacement of Existing Buildings) of said Redevelopment Plan; (c) Projects for which a density variation of 50,000 square feet or less is granted under Section 437 of said Redevelopment Plan; (d) Projects for which a density variation of more than 50,000 square feet was granted under Section 437 of said Redevelopment Plan prior to the effective date of this ordinance; (e) Projects approved pursuant to any procedure to regulate transfers of floor area as may be adopted by the City Council. The term “floor area” shall mean floor area as defined in Municipal Code Sections 12.21.1-A.5 and 12.21.1-B-4. (page 43 of Ordinance No. 164,307-SA2880).*

The “O” designation indicates that the Project Site is located in an Oil Drilling District, specifically the Los Angeles Downtown Oil Field. The Project Site is located within the Greater Downtown Housing Incentive Area (Ordinance 179,076, effective Sept. 2007), which establishes incentives for development regulations including but not limited to floor area, density, setback, buildable area, open space, and parking. In addition, the Project Site is located within the City Center Redevelopment Project area, the Central City Parking District, the Downtown Business Parking District, the Central City Transfer of Floor Area Rights (TFAR) Area, the Downtown Adaptive Reuse Incentive Area, and the Enterprise Zone (the Employment and Economic Incentive Program Area). The designs of development projects on the Project Site are further guided by the Downtown Design Guide. The Project Site is also designated as a TPA.<sup>3</sup>

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<sup>3</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, accessed February 2019.



Source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.



Figure 2.2  
Zoning and General Plan Land Use Designations

### **2.1.1 Central City Community Plan**

The Project Site is located within the Central City Community Plan (Community Plan) area of the City. The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. The Community Plan area contains a substantial amount of commercial development. More specifically, the Project Site is located in the South Park area, which is recognized to be a mixed-use community with a significant concentration of housing. This thriving residential community includes the proximate siting of auxiliary support services such as retail and commercial developments that provide employment opportunities for area residents.<sup>4</sup>

### **2.1.2 Downtown Los Angeles Community Plan Update (DTLA 2040)**

The Los Angeles Department of City Planning is in the process of updating the Central City and Central City North Community Plans to create the Downtown Community Plan. The purpose of the Downtown Community Plan is to create and implement a vision of the future for Downtown Los Angeles. Downtown is the birthplace of Los Angeles and the primary center of urban activity in the region. It remains the City's commercial, entertainment, cultural, and civic heart. Now enjoying a renaissance, Downtown is home to a diverse range of industries and a patchwork of distinct neighborhoods that sit at the center of an expanding regional transportation network. According to regional projections, by the year 2040, Downtown will be adding approximately 125,000 people, 70,000 housing units, and 55,000 jobs. The Plan will strive to support and sustain the ongoing revitalization of Downtown, while thoughtfully accommodating this projected future growth. The Downtown Community Plan will promote a dynamic, healthy and sustainable Downtown core that is tightly connected to its surroundings and supports the City and the region. The following core principles represent the long-term priorities for the Downtown Community Plan: accommodate anticipated growth through 2040 in an inclusive, equitable, sustainable, and healthy manner, while supporting and sustaining Downtown's ongoing revitalization; reinforce Downtown's jobs orientation; grow and support the residential base; strengthen neighborhood character; promote a transit-, bicycle-, and pedestrian-friendly environment; create linkages between districts; and create a world-class streets and public realm. The City Council has not formally adopted the Downtown Community Plan and new Zoning Code, and the City Planning Commission (CPC) is currently deliberating over the future proceedings of the Plan.<sup>5</sup>

### **2.1.3 City Center Redevelopment Plan**

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<sup>4</sup> City of Los Angeles, *Central City Community Plan*, accessed July 2021.

<sup>5</sup> City of Los Angeles, *Downtown Los Angeles Community Plan Update*, website: <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>, accessed June 2021.

The Project Site is located within the City Center Redevelopment Project area. The City Center Redevelopment Plan, effective May 15, 2002, is valid until May 15, 2032.<sup>6</sup> While AB1X-26 dissolved redevelopment agencies as of October 2011, the land use regulations of the City Center Redevelopment Plan remain in effect. Pursuant to Ordinance 186,325, approved by the City Council on September 27, 2019, the land use review and approval authority of the the former Community Redevelopment Agency of the City of Los Angeles (CRA/LA) or the CRA/LA, a Designated Local Authority Successor to the Community Redevelopment Agency of the City of Los Angeles (CRA/LA-DLA), was transferred to the City of Los Angeles.

Within the City Center Redevelopment Project Area, the Project Site is located within the South Park Development area. The Redevelopment Plan's objective for the South Park Development area is to achieve a mixed-use live/work community, consisting of a housing-commerce community featuring open space. Rehabilitation of this area is in part dependent on addressing the social, medical and economic problems of the Central City population. A major share of land use shall be devoted to housing, to be developed for all income groups and family sizes. Specialized facilities and amenities such as day care centers, playgrounds, and recreational areas designed for all aged groups should be developed in conjunction with new housing.<sup>7</sup> The City Center Redevelopment Plan restricts development on the Project Site to an allowable floor area ratio (FAR) of 6 times the buildable area of the site unless a TFAR Request is approved, in which case the maximum FAR is 13 times the buildable area of the Project Site.

## 2.2 Existing Site Conditions

Figure 2.3, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 2.4, Photographs of the Project Site.

The Project Site is currently improved with four one-story commercial buildings, with a total of approximately 28,110 square feet of floor area, and a surface parking lot, as seen in Figure 2.4 below. One structure on the Project Site, totaling 1,400 square feet, is vacant. As such, the existing conditions baseline includes 26,710 square feet of active uses. There is one vehicular driveway located along the west side of Main Street that provides access to the on-site surface parking lot. There are nine non-protected street trees in the public right-of-way surrounding the Project Site: eight trees along Main Street and one tree along 12<sup>th</sup> Street.

## 3. Surrounding Land Uses

As shown in Figure 2.2, the Project Site is in a commercially zoned "C2" area, and properties immediately bordering the Project Site are zoned C2-4D-O, C2-4D-O-SN, or [T][Q]C2-4D with a

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<sup>6</sup> *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, May 2002.*

<sup>7</sup> *Ibid.*

Regional Center Commercial General Plan Land Use Designation or zoned M2-2D with a Light Manufacturing General Plan Land Use Designation. The properties surrounding the Project Site include a mix of commercial/retail, light industrial, office, surface parking, and mixed-use properties. These land uses range in height from one- to seven-stories above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 2.5, Photographs of Surrounding Uses, Views 7 through 12. Figure 2.3 shows an aerial photograph of the uses surrounding the Project Site. Below is description of the existing conditions in the surrounding area.

North: The Project Site is immediately bordered by surface parking to the north. The Harris building, a seven-story mixed-use building, is located further north of the Project Site on the southwest corner of Main Street and 11<sup>th</sup> Street. These properties are zoned C2-4D-O with a Regional Center Commercial General Plan land use designation (See Figure 2.5, Views 7 and 11).

East: Main Street immediately borders the Project Site to the east. The properties to the east of the Project Site, across Main Street, are currently occupied by one- to two-story commercial/retail buildings. These properties are zoned [T][Q]C2-4D with a General Plan Land Use Designation of Regional Center Commercial. The City recently approved an eight-story mixed-use residential and commercial building at 1100 – 1146 ½ S. Main Street. The one-story commercial building at 1150 S. Main Street would remain. This property is zoned M2-2D with a General Plan Land Use Designation of Light Manufacturing (See Figure 2.5, View 8).

South: The Project Site is immediately bordered by 12<sup>th</sup> Street to the south. Directly south of the Project Site, across 12<sup>th</sup> Street is a seven-story mixed-use residential and commercial building. This property is zoned C2-4D-O with a Regional Center Commercial General Plan Land Use Designation (See Figure 2.5, Views 12).


West: The Project Site is immediately bordered by an alleyway to the west. Surface parking lots, commercial, office, and light industrial buildings are located west of the Project Site, across the alleyway. These buildings range from one- to two-stories. These properties are zoned C2-4D-O-SN with Regional Center Commercial General Plan Land Use Designations (See Figure 2.5, Views 9 and 10).





### LEGEND

 Project Site Boundary

 Photograph Locations

 Surrounding Land Uses:

- 1: Commercial Club Hotel (1100 S. Broadway)
- 2: Harris Building (110 W. 11th St.)
- 3: Parking Structure (1120 S. Broadway)
- 4: Commercial Buildings (1138 & 1144 S. Broadway)
- 5: Proposed Mixed-Use Residential/Commercial (1100 S. Main St.)
- 6: Commercial/Retail Buildings (1150-1158 S. Main St.)
- 7: Light Industrial Buildings (1200 S. Main St.)
- 8: Mixed-use Residential/Commercial Building (1200 S. Broadway)
- 9: Surface Parking Lots

SCALE: APPROXIMATE

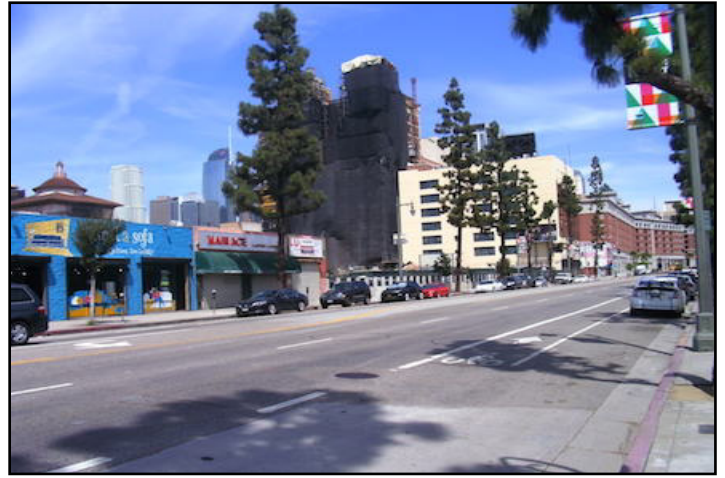
0 70' 140'



Source: Google Earth, Aerial View, 2019.



View 1: From the southeast corner of the intersection of Main Street and 12th Street, looking north at the Project Site.



View 2: From the east side of Main Street, looking northeast at the Project Site.



View 3: From the east side of Broadway, looking south at the western property line of the Project Site.



View 4: From the southeast corner of the intersection of Main Street and 12th Street, looking northwest at the southern border of the Project Site.



View 5: From the north side of 12th Street, looking northeast at the alley adjacent to the western border of the Project Site.



View 6: From the east side of Main Street, looking southwest at the Project Site.

Source: Parker Environmental Consultants, April 1, 2019.



Figure 2.4  
Photographs of the Project Site  
Views 1-6



View 7: From the east side of Main Street, looking northwest at the surface parking lot adjacent to the Project Site.



View 8: From the west side of Main Street, looking northeast at the commercial buildings east of the Project Site.



View 9: From the north side of Broadway, looking northeast at the commercial buildings and surface parking lot west of the Project Site.



View 10: From the north side of Broadway, looking south at the surface parking lot adjacent to the western border of the Project Site.



View 11: From the northeast corner of the intersection of Main Street and 11th Street, looking southwest at the commercial building and surface parking lot adjacent to the Project Site.



View 12: From the north side of 12th Street, looking south at the commercial buildings adjacent to the Project Site.

Source: Parker Environmental Consultants, April 1, 2019.

## C. Description of Project

### 1. Project Overview

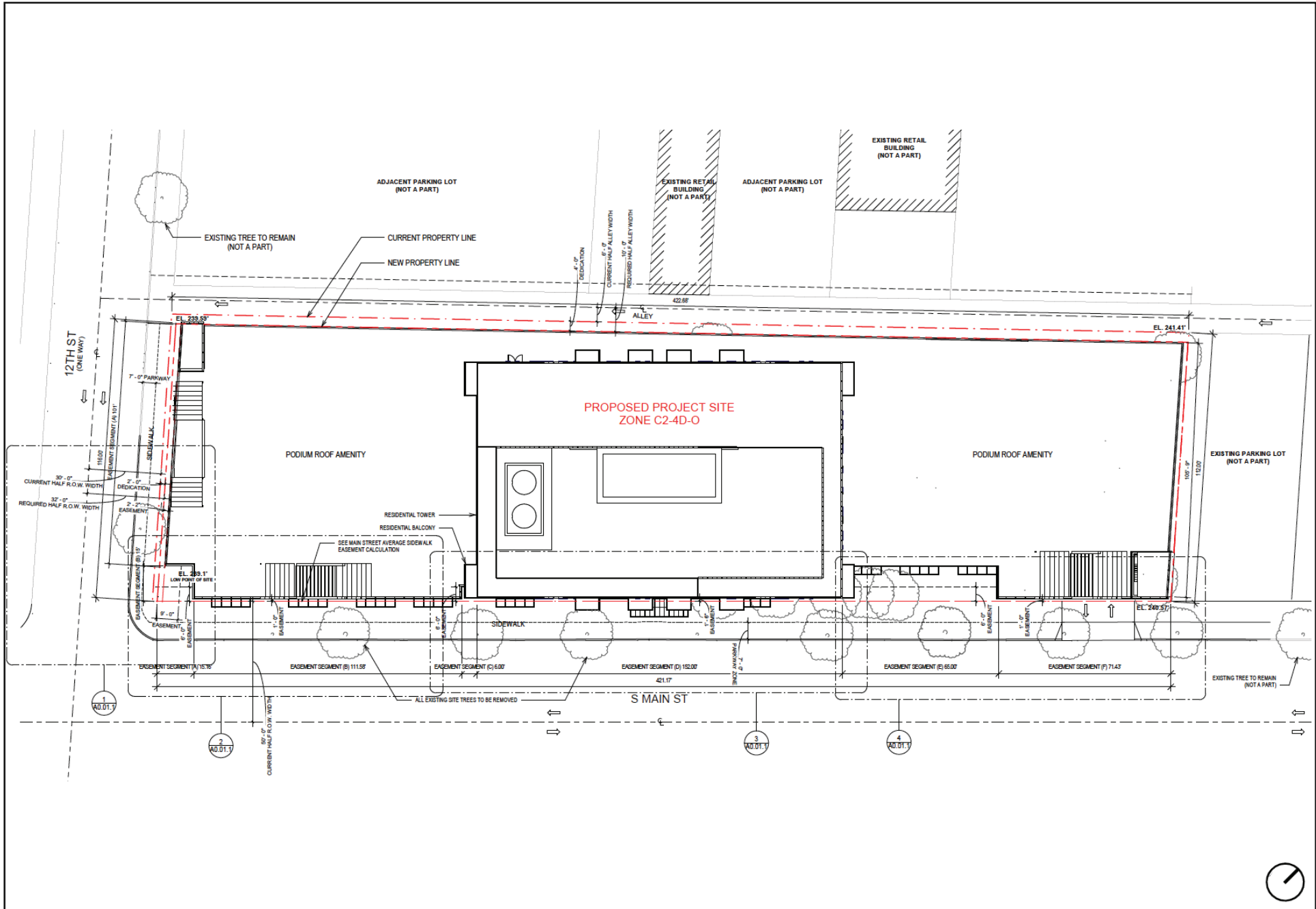
The Proposed Project includes the demolition of the four existing on-site buildings (Project Site) and the construction, use, and maintenance of a 30-story mixed-use building with 363 dwelling units and 12,500 square feet of ground-floor commercial space. The Proposed Project would provide 373 vehicle parking spaces and would be provided on the ground level through the fourth level above grade. A summary of the Proposed Project is provided in Table 2.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 2.6, Plot Plan. The floor plans are illustrated in Figures 2.7 through 2.11.

**Table 2.2  
Proposed Development Program**

Land Uses	Units	Floor Area (Square Feet)
<b>Residential</b>		
Studio Units	122	330,947 <sup>a</sup>
1-Bedroom Units	133	
2-Bedroom Units	96	
3-Bedroom Units	12	
<b>Subtotal</b>	<b>363</b>	
<b>Non-Residential</b>		
Commercial/Retail	--	12,500
<b>Total Floor Area:</b>		<b>343,447 <sup>b</sup></b>
<b>FAR:</b>		<b>7.03:1</b>
<p>Notes:</p> <p><sup>a</sup> Residential floor area includes common areas, interior lobby and recreational amenity areas, and interior spaces within the proposed dwelling units.</p> <p><sup>b</sup> Pursuant to the definition of the term "floor area" in LAMC Section 12.03, structured parking areas are excluded from the floor area calculations for purposes of calculating floor area ratio (FAR). The Proposed Project includes 373 parking spaces in three levels above grade and on the ground floor that is not counted towards the FAR.</p> <p>Source: MVE + Partners, July 14, 2021.</p>		

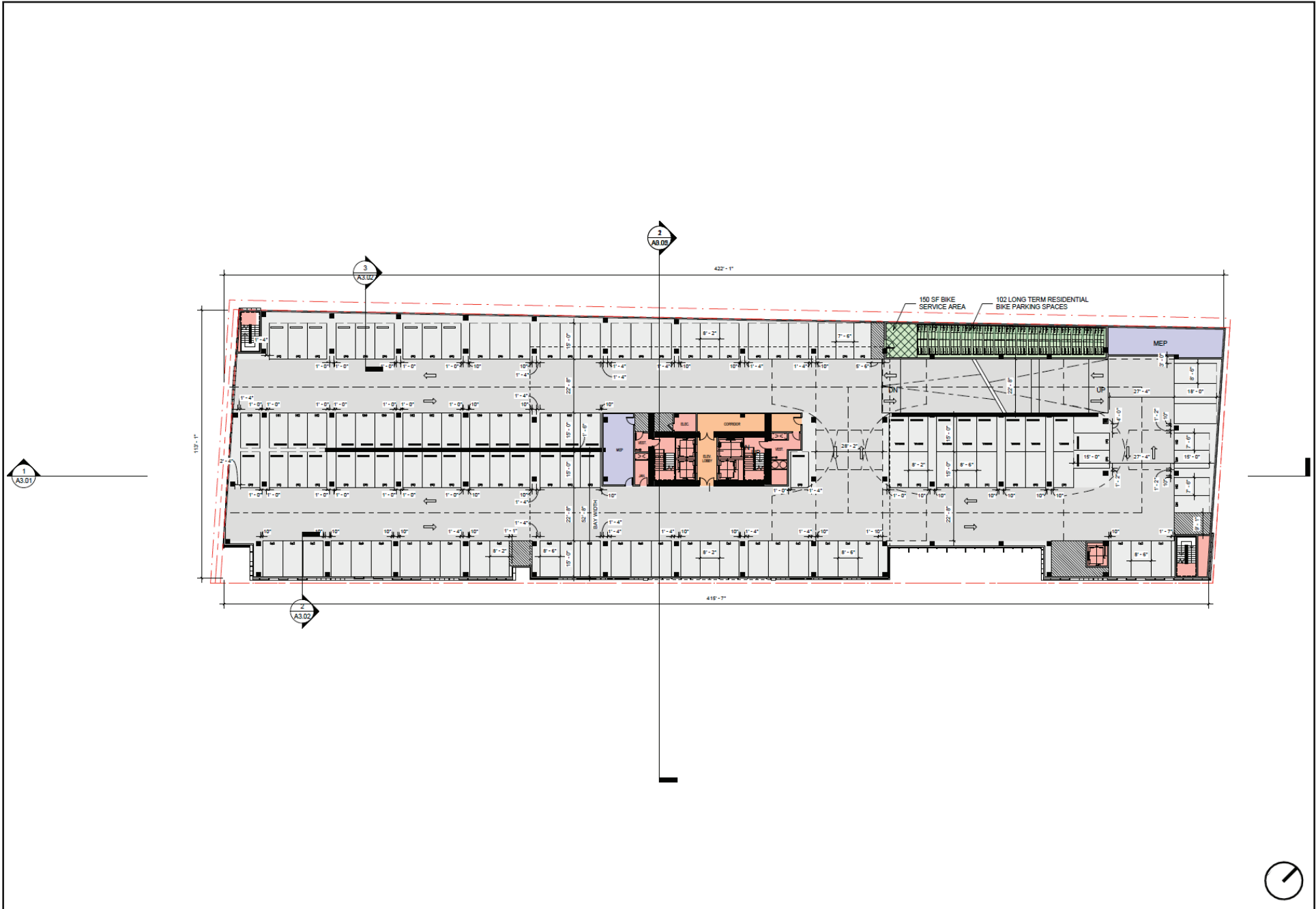
#### **Residential Uses**

As shown in Table 2.2, above, the Proposed Project would include a maximum of 363 residential units on the sixth floor through the 29<sup>th</sup> floor. The unit mix is diverse and would include 122 studio units, 133 one-bedroom units, 96 two-bedroom units, and 12 three-bedroom units of varying sizes and configurations. The building would include a residential lobby located on the ground floor. Additional residential amenity space would be located on the ground floor, fifth level, and 30th level. The total residential floor area totals approximately 330,947 square feet.



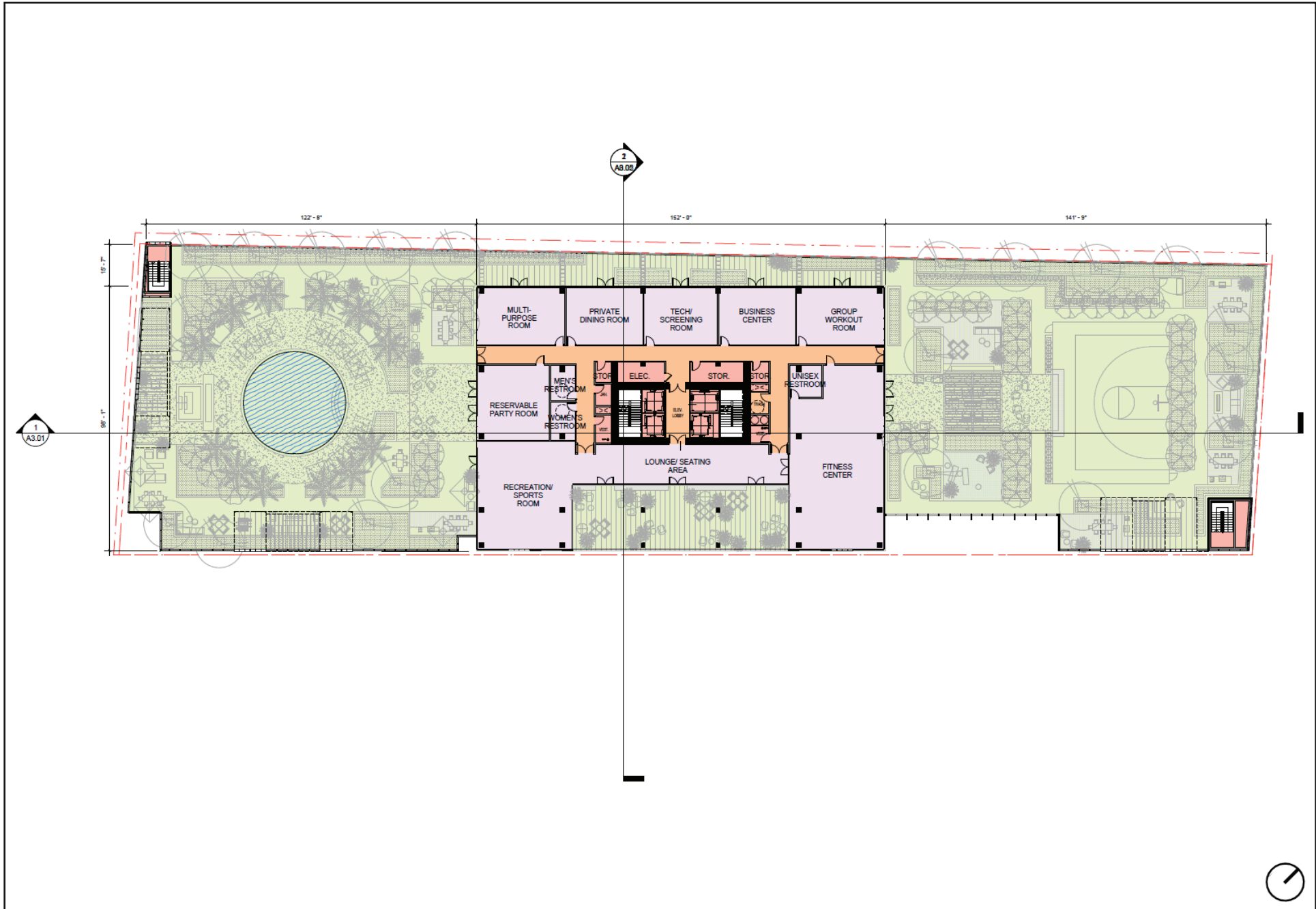
Source: MVE + Partners, July 14, 2021.





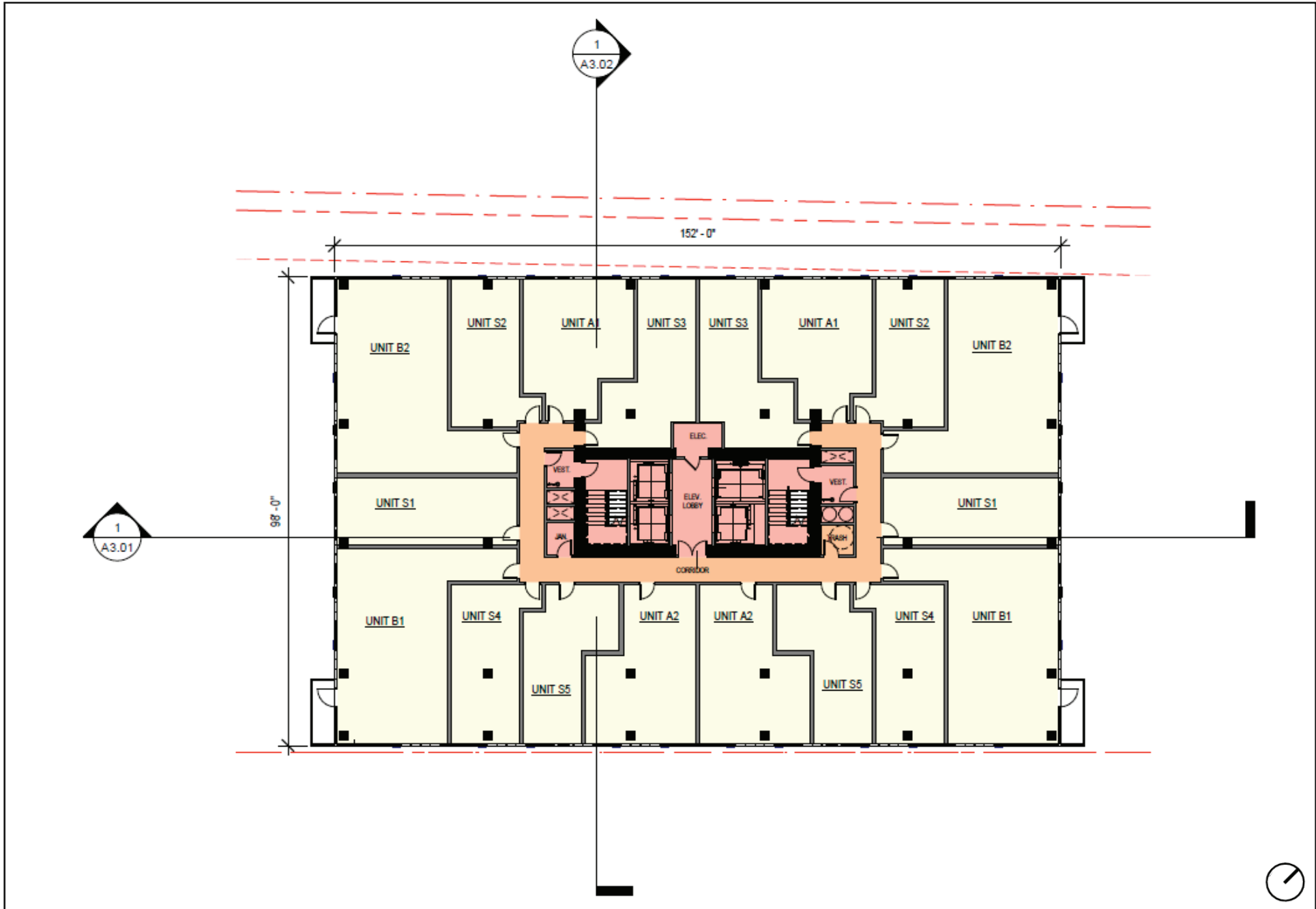
Source: MVE + Partners, July 14, 2021.

Figure 2.8  
Level 2 Floor Plan

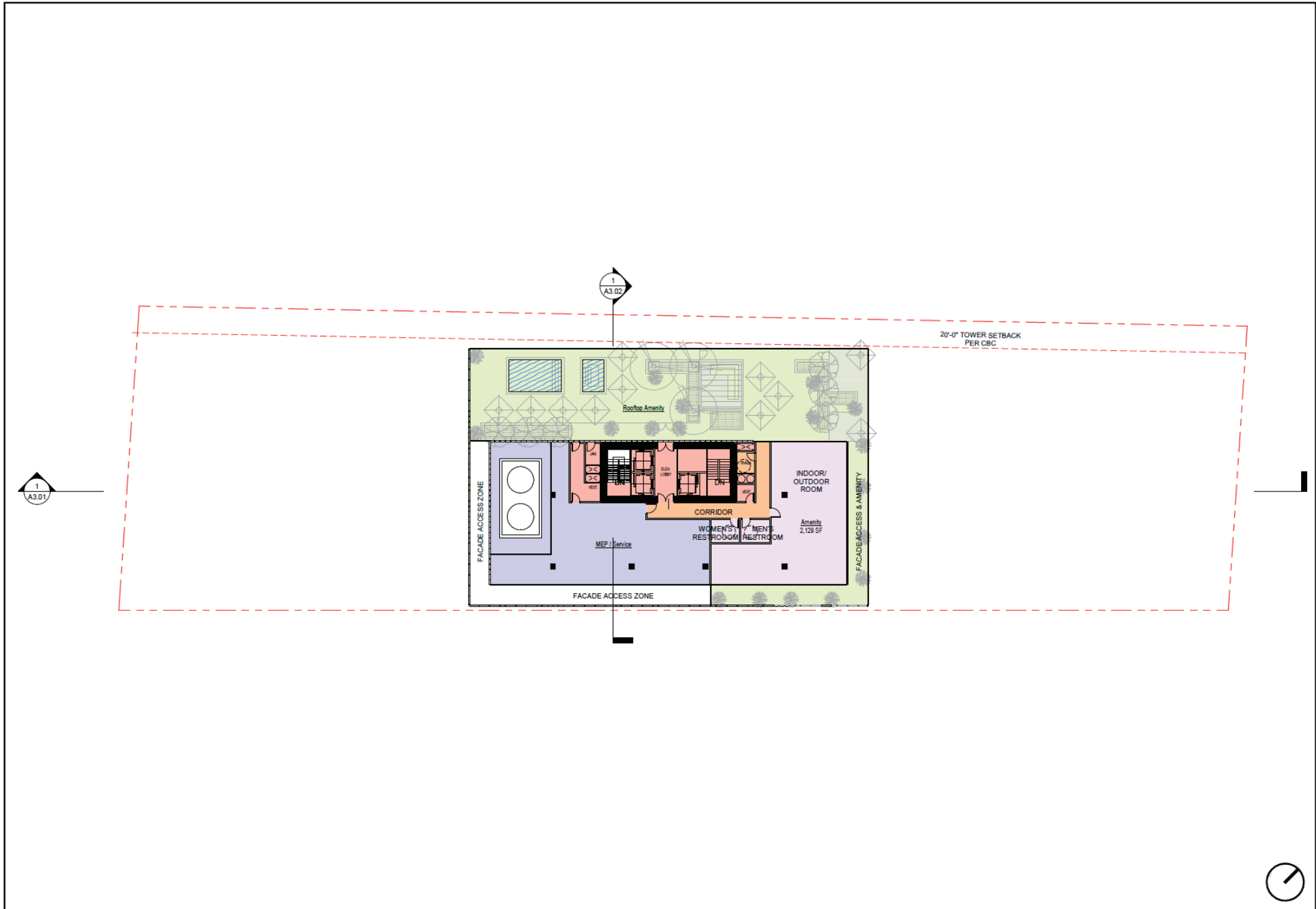


Source: MVE + Partners, July 14, 2021.





Source: MVE + Partners, July 14, 2021.



Source: MVE + Partners, July 14, 2021.

### **Commercial Uses**

The Proposed Project includes neighborhood serving ground-floor commercial space, which would be comprised of commercial and retail spaces, totaling up to approximately 12,500 square feet of floor area. The commercial uses would front Main Street.

## **2. Floor Area**

The Project Site includes a gross lot area of 48,908 square feet. The Redevelopment Plan and “D” limitation limit the total floor area of the Project Site to a ratio of 6:1, or approximately 293,448 square feet based on lot area. The Applicant is seeking a TFAR of 49,999 square feet of floor area. Per the Community Plan, Redevelopment Plan and the TFAR, development of the Project Site is allowed to a maximum FAR of 7.03:1, resulting in an allowable floor area potential of 343,447 square feet. The Proposed Project would provide approximately 343,447 square feet of floor area for an approximate 7.03:1 FAR.

## **3. Building Height**

As stated previously, the Project Site is located in Height District No. 4, which does not set a specific height limit for development in a C2 zone but limits development to a FAR of 6:1 with the “D” limitation. An FAR of 7.03:1 can be accomplished with the TFAR. The proposed 30-story building is planned for a height of 333 feet above grade at the top of the roof and a maximum height of 340 feet above grade to include the roof appurtenances. Refer to Figures 2.12 through Figure 2.14 for the elevations of the proposed building. Illustrations depicting the building sections of the Proposed Project are provided in Figure 2.15.

## **4. Setbacks**

Per Ordinance No. 179,076, LAMC Section 12.22 C.3(a), no yard requirements apply for lots in the C2 Zone in the Greater Downtown Housing Incentive Area, except as required by the Downtown Design Guide. The Downtown Design Guide encourages variations in setbacks along street frontages. The Project Site is located on the northwest corner of Main Street and 12<sup>th</sup> Street, which are non-Retail Streets per the Downtown Design Guide. The Downtown Design Guide states that the building street wall adjacent to ground floor space designed for retail use on non-Retail Streets shall be located at or within five feet of the back of the required average sidewalk width in the South Park District. A majority of the building street walls on Main Street and 12<sup>th</sup> Street would be located at or within five feet of the back of the required average sidewalk widths.

## **5. Design and Architecture**

The Proposed Project is a high-rise (30-story) modern mixed-use building designed with modern architectural materials including glass railing, metal panels, aluminum windows, frosted glass, metal louvers, store front glazing, and concrete. Mechanical equipment on the roof level is

enclosed with a louvered mechanical screen. Architectural renderings of the Proposed Project are provided in Figure 2.16.

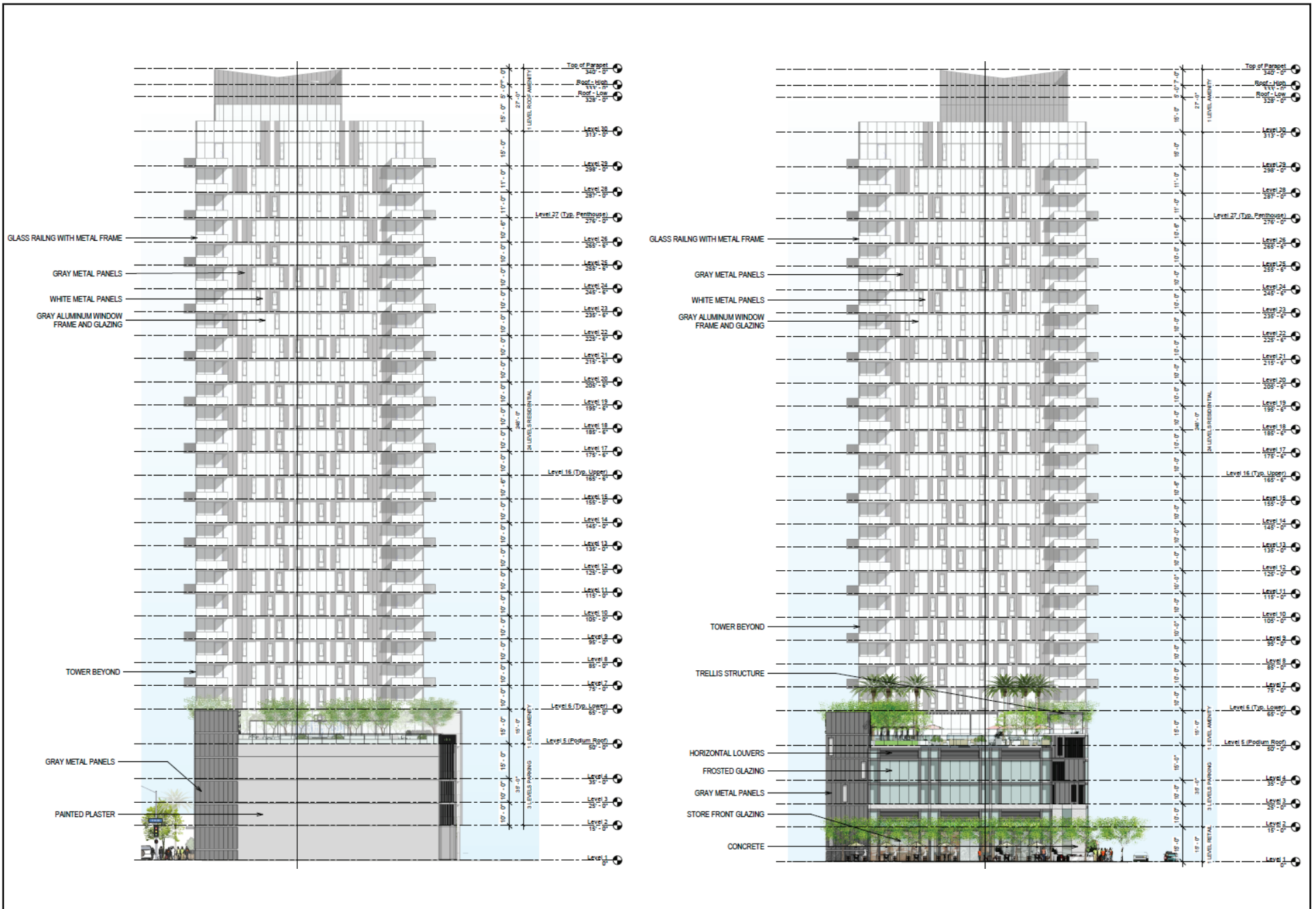
## 6. Open Space and Landscaping

The open space requirements and amount of open space proposed for the Proposed Project are summarized in Table 2.3, Summary of Required and Proposed Open Space Areas, below. Pursuant to the LAMC, the Proposed Project would be required to provide 39,600 square feet of open space. The Project Site would provide 39,601 square feet of open space including a 5<sup>th</sup> level outdoor amenity deck, roof level deck residential lobby, and indoor open space that would be open to the public. The Proposed Project would also provide one tree per every four residential units for a total of at least 91 trees on-site. Figure 2.17 illustrates the composite landscape plan for the Proposed Project.

**Table 2.3**  
**Summary of Required and Proposed Open Space Areas**

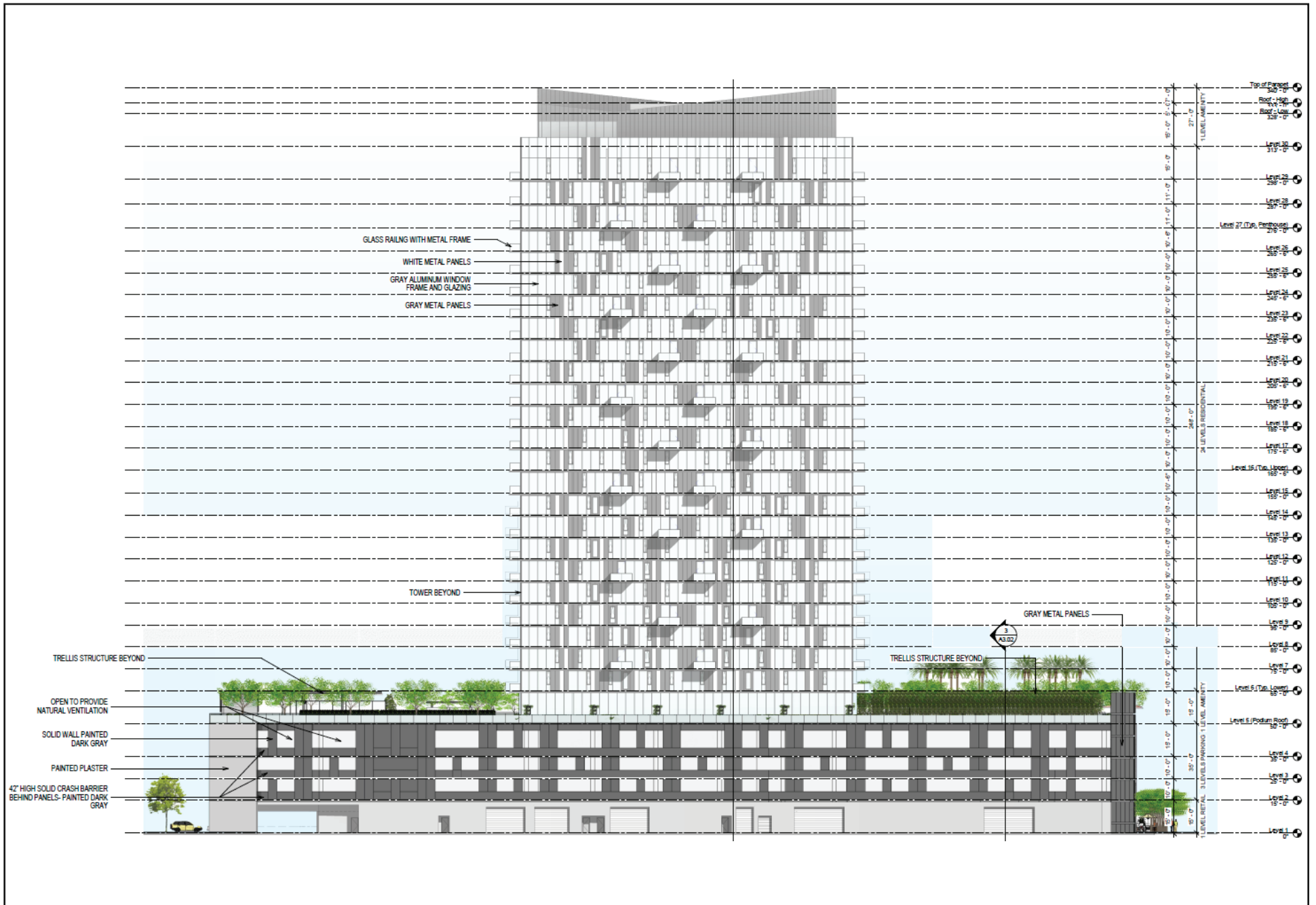
<b>LAMC Open Space Requirements</b>	<b>Dwelling Units</b>	<b>Open Space (square feet)</b>
Less than 3 Habitable Rooms (100 sf/du)	255	25,500
3 Habitable Rooms (125 sf/du)	96	12,000
More than 3 Habitable Rooms (175 sf/du)	12	2,100
<b>Total:</b>	<b>363</b>	<b>39,600</b>
<b>Proposed Open Space</b>	<b>Open Space (square feet)</b>	
Level 5 Landscape Roof Deck	27,160	
Roof Level Deck	2,541	
Indoor Common Space	9,900	
<b>Total:</b>	<b>39,601</b>	
<i>Notes: du = dwelling unit; sq = square feet</i>		
<i>Source: MVE + Partners, July 14, 2021.</i>		

To facilitate construction of the Proposed Project, the nine non-protected street trees fronting the Project Site on Main Street and 12<sup>th</sup> Street would need to be removed and replaced. One of the nine trees is a stump and is not required to be replaced, as it is a pre-existing condition within the public right-of-way and is not classified as a significant tree. Street trees would be replaced at a ratio of 2:1, for a minimum of 16 new street trees to be planted along the public right-of way fronting S. Main Street. The removal and replacement of any public trees within the public right-of way, would require review and approval by the City of Los Angeles Board of Public Works, Urban Forestry Division (See Tree Report, Appendix B of this SCEA).

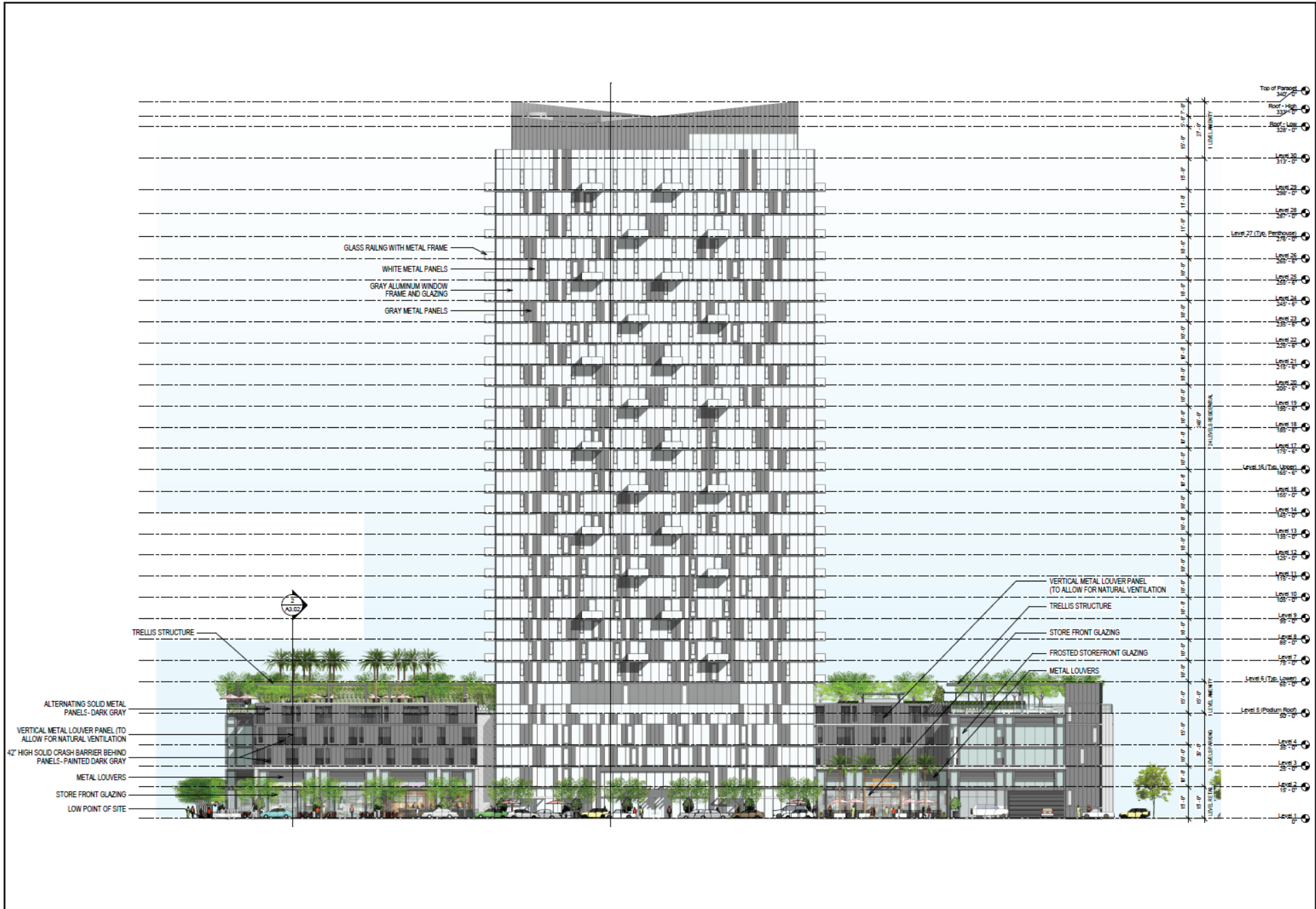


Source: MVE + Partners, July 14, 2021.

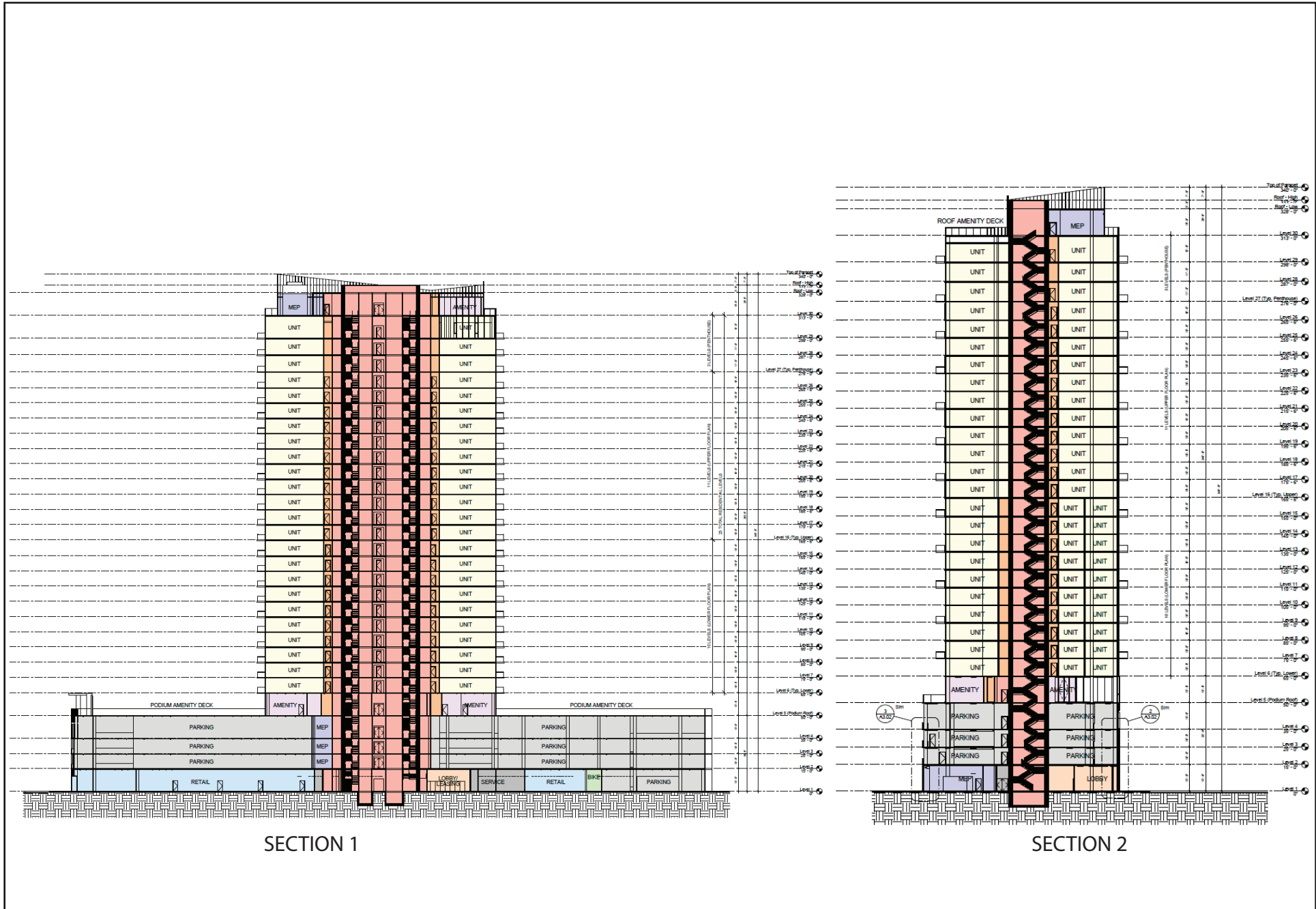
Figure 2.12  
North and South Elevations



Source: MVE + Partners, July 14, 2021.



Source: MVE + Partners, July 14, 2021.



SECTION 1

SECTION 2

Source: MVE + Partners, July 14, 2021.





View 1

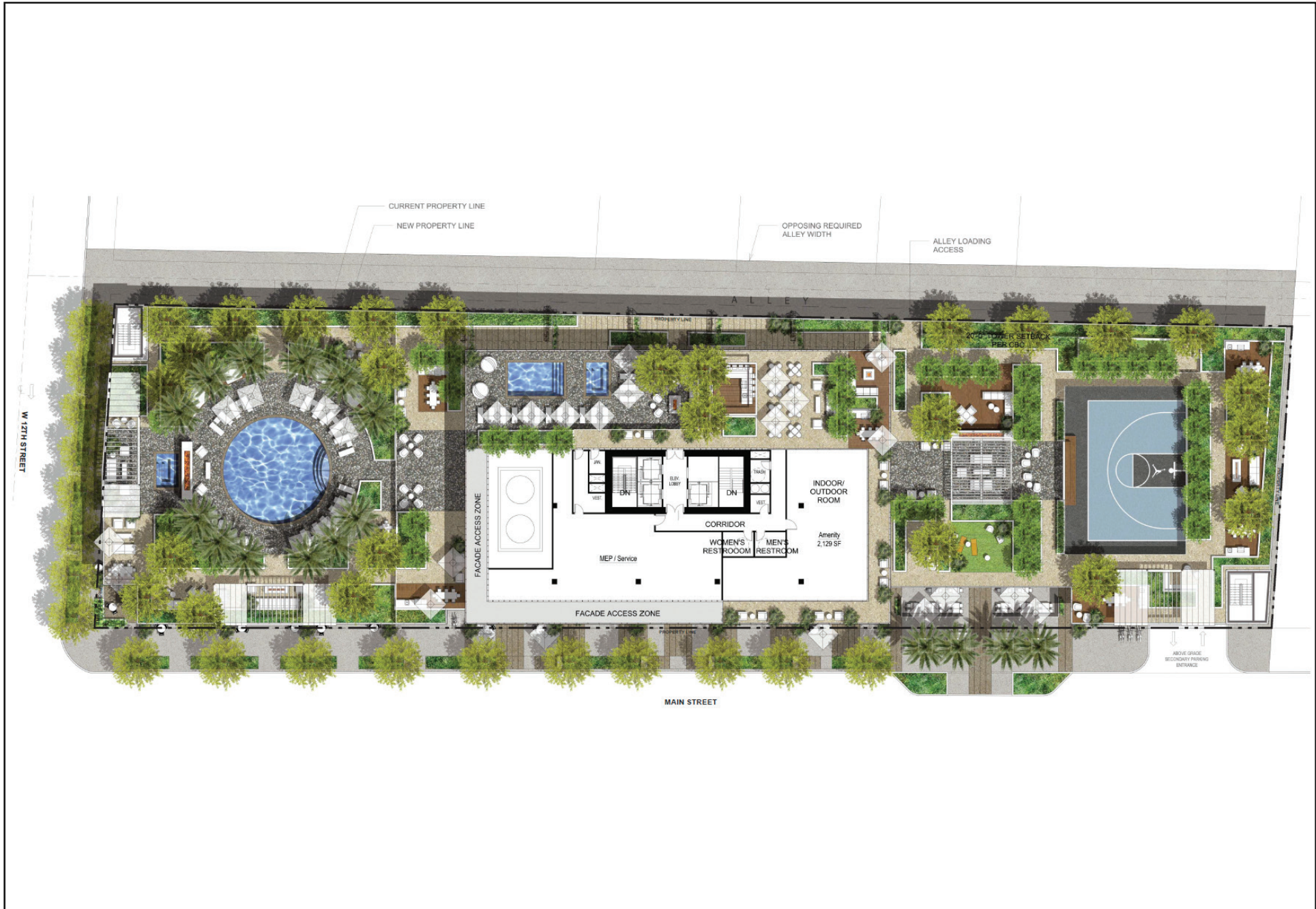


View 2



View 3

Source: MVE + Partners, July 14, 2021.



Source: MVE + Partners, May 3, 2021.

## 7. Access, Circulation, and Parking

Parking for the proposed residential and commercial uses on-site would be provided on the ground level through level four above grade. Vehicular access to the Project Site would be provided via two full-access driveways: one driveway from the alleyway and one driveway along Main Street. Another entrance-only driveway and an exit-only driveway would also be located along the alleyway.

### Vehicle Parking

The Project Site is located within the Central City Parking District (LAMC Section 12.21 A.4(p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable rooms. The Project Site is also located in the Downtown Business Parking District (LAMC Section 12.21 A.4(i)), which establishes parking for certain non-residential uses. Pursuant to the Downtown Business Parking District, business, commercial or industrial buildings having a gross floor area of 7,500 square feet or more must provide at least one parking space for each 1,000 square feet of floor area, exclusive of floor areas used for automobile parking space, basement storage or for rooms housing mechanical equipment incidental to the operation of buildings. Table 2.4, Summary of Required and Proposed Vehicle Parking Spaces, provides a summary of the LAMC parking requirements and amount of parking proposed for the residential and commercial uses.

**Table 2.4**  
**Summary of Required and Proposed Vehicle Parking Spaces**

Description	Quantity	Parking Required		Parking Provided
		Rate	Spaces	
<b>Residential</b>				
Units with 3 or less Habitable Rooms	255	1 per du <sup>a</sup>	255	
Units with more than 3 Habitable Rooms	108	1.25 per du <sup>a</sup>	135	
<i>Subtotal Residential</i>	<b>363 du</b>		<b>390</b>	<b>363</b>
<b>Commercial</b>				
Retail/Restaurant	12,500 sf	1 per 1,000 sf <sup>b</sup>	<b>12</b>	<b>10</b>
		<i>7% Residential Reduction <sup>c</sup></i>	-27	
		<i>20% Commercial Reduction <sup>c</sup></i>	-2	
		<b>TOTAL</b>	<b>373</b>	<b>373</b>

**Notes:**

*du = dwelling unit, sf = square feet*

<sup>a</sup> *Parking requirements as calculated by the Central City Parking District (CCPD) exceptions to the rates presented in Los Angeles Municipal Code (LAMC) Section 12.21 A 4 (a-f), City of Los Angeles, revised July 24, 2013.*

<sup>b</sup> *Developments within the Downtown Business Parking District need to provide 1 parking space for every 1,000 sf of commercial uses, in excess of 7,500 square feet of commercial space. (LAMC 12.21 A.4(i)).*

<sup>c</sup> *Pursuant to LAMC Section 12.21 A.4, up to 10 percent of the required parking residential uses and up to 20 percent of required parking non-residential uses may be replaced by bicycle parking at a ratio of one vehicle space for four bicycle parking spaces.*

*Source: MVE + Partners, July 14, 2021.*

Pursuant to LAMC Section 12.27, the Applicant requests a Zone Variance to permit 100 percent of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard-size spaces.

### ***Bicycle Parking***

The Proposed Project provides on-site bicycle parking for short-term and long-term bike storage. As summarized in Table 2.5, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC as amended by Ordinance No. 185,480 adopted on March 27, 2018 for bicycle parking spaces and provide 23 short-term and 172 long-term bicycle parking spaces. In the event the number of residential units or commercial space is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements.

**Table 2.5  
Summary of Required and Proposed Bicycle Parking Spaces**

Description	Quantity	Parking Required <sup>a</sup>		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
<b>Residential (363 du) <sup>b,c</sup></b>					
Units 1-25	25	2.5	25		
Units 26-100	75	5	50		
Units 101-200	100	5	50		
Units 200+	163	4	41		
<i>Subtotal Residential:</i>		17	166	<b>183</b>	<b>183</b>
<b>Commercial <sup>d</sup></b>					
Retail/Restaurant	12,500 sf	6	6	12	12
<b>TOTAL</b>		<b>23</b>	<b>172</b>	<b>195</b>	<b>195</b>
<p><i>Notes:</i>  <sup>a</sup> <i>du = dwelling unit, sf = square feet</i>  <sup>a</sup> <i>LAMC 12.21 A.16. Bicycle Parking and Shower Facilities, revised May 9, 2018.</i>  <sup>b</sup> <i>Short-term bicycle rates for residential uses are as follows: 1 space per 10 units for first 25 units; 1 space per 15 units for units 26-100; 1 space per 20 units for units 101-200, and 1 space per 40 units for units over 200.</i>  <sup>c</sup> <i>Long-term bicycle rates for residential units are as follows: 1 space per unit for first 25 units; 1 space per 1.5 units for units 26-100; 1 space per 2 units for units 101-200; and 1 space per 4 units over 200.</i>  <sup>d</sup> <i>Commercial uses including retail shall provide both short- and long-term parking at a rate of one space per 2,000 sf.</i>  <i>Source: MVE + Partners, July 14, 2021.</i></p>					

## **8. Lighting and Signage**

Exterior lighting features within the Proposed Project would consist of low level illuminated pedestrian walkways and lighting within common open space areas and outdoor courtyards. On site signage would include site identity and wayfinding signs in accordance with the LAMC.

## 9. Site Security

Security for the Proposed Project would be provided via site planning and secured access points of entry. The Proposed Project would include security design measures for semi-public and private spaces, which may include but not be limited to access control to the building, surveillance cameras, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

## 10. Sustainability Features

The Proposed 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. Among many requirements, the L.A. Green Building Code requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Proposed Project's energy consumption.

## 11. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 30 months, with final buildout occurring in 2026. Construction activities associated with the Project would be undertaken in five main steps: (1) demolition/site clearing; (2) grading; (3) building construction; (4) paving; and (5) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. The Department of City Planning further restricts the hours of construction in residential areas to 6:00 P.M. on weekdays. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

### ***Demolition/Site Clearing Phase***

This phase would include the demolition of the four commercial buildings and surface parking areas on the Project Site. In addition, this phase may include the removal of walls, fences, and associated debris. The demolition/site clearing phase would be completed in approximately one month.

### ***Grading Phase***

After the completion of the demolition phase, the grading/excavation phase for the Proposed Project would occur for approximately six months and would involve excavating the Project Site for the cut and fill of land to ensure the proper base and slope for the building foundations. The Proposed Project would require approximately 5,434 cy of soil export to be hauled off-site, and approximately 5,434 cy of soil import to be hauled on-site in order to build the building foundations.

### ***Building Construction Phase***

The building construction phase consists of above grade structures and is expected to occur for approximately 18 months. The building construction phase includes the construction of the proposed building, connection of utilities to the building, building foundations, parking structure, laying irrigation for landscaping, and landscaping the Project Site.

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, will be properly permitted by the City agencies and will conform to City standards.

### ***Paving Phase***

This phase of construction would entail paving the sidewalks and installing hardscape and landscaping features throughout the common areas, and is expected to occur for approximately one month. Paving also involves the laying of concrete or asphalt along the adjacent roads, setbacks, and alleyway.

### ***Finishing/Architectural Coating Phase***

The finishing/architectural coating phase is expected to occur over approximately four months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing's and paint would be applied, and the installation of windows, doors, cabinetry, and appliances within the residential units.

### ***Temporary Right-of-Way Encroachment***

Construction activities would necessitate temporary lane closures on 12<sup>th</sup> Street and Main Street, adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible

on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in Checklist Question XVII(a), Transportation, a construction worksite traffic control plan shall be submitted to LADOT review and approval in accordance with the LAMC prior to the start of any construction work (see PDF TRAFFIC-2). The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on 12<sup>th</sup> Street and Main Street fronting the Project Site will be maintained and protected from the active construction site. Temporary detours would be coordinate with the City on an as needed basis.

### **Haul Route**

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon landfill, which accepts construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 28 miles north of the Project Site (approx. 56 miles round trip). For recycling efforts, Downtown Diversion (operated by Waste Management, Inc.) accepts construction and demolition waste for recycling and is located approximately 2.2 miles southeast of the Project Site (approximately 4.4 miles round trip).<sup>8</sup> Construction debris generated during the building construction phase would be hauled to the Downtown Diversion station for processing, recycling, and reclamation. Any waste materials that are not suitable for diversion would likely be disposed of at the Sunshine Canyon Landfill facility.

## 12. Related Projects

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the Proposed 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*

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<sup>8</sup> Construction and Demolition Debris Recycling Facilities in Los Angeles County, website: [https://dpw.lacounty.gov/epd/CD/cd\\_attachments/Recycling\\_Facilities.pdf](https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf), accessed July 2021.

*of past projects, the effects of other current projects, and the effects of probable future projects.*

*(2) 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.*

*(3) 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.*

*(4) 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."*

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, 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 related projects identified are included in Table 2.6, Related Projects List, below. A total of 36 related projects were identified within the vicinity of the Project Site. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section 4 of this SCEA. The locations of the related projects are shown in Figure 2.18, Location of Related Projects.

**Table 2.6  
Related Projects**

Project Number	Project Name	Location/Address	Project Description	Size	Units
1	11 <sup>th</sup> & Hill Project	1111 S. Hill Street	Condominium Hotel Restaurant	319 160 3,429	du room sf
2	City Market Mixed-Use	1057 S San Pedro Street	Office Retail Movie Theater Apartment Condominium Hotel	549,141 224,862 744 877 68 210	sf sf sf du du rm
3	Hill Street Mixed-Use	920 S. Hill Street	Apartment Retail	239 5,400	du sf
4	Broadway Lofts	955 S. Broadway	Apartment Retail	163 6,406	du sf
5	Herald Examiner	1111 S. Broadway	Apartment Office Retail	391 39,725 49,000	du sf sf
6	---	1400 S. Figueroa Street	Apartment Retail/Restaurant	106 4,834	du sf
7	Alexan Mixed-Use	850 S. Hill Street	Apartment Retail Restaurant	300 3,500 3,500	du sf sf
8	Grand Residence	1229 S. Grand Avenue	Condominium Restaurant	161 3,000	du sf
9	The Hill	940 S. Hill Street	Apartment Restaurant	232 14,000	du sf
10	Emerald Mixed-Use	1340 S. Olive Street	Apartment Retail Restaurant	156 5,000 10,000	du sf sf
11	---	1334 S. Flower Street	Apartment Retail/Restaurant	188 10,096	du sf
12	---	1400 S. Flower Street	Apartment Retail	152 1,184	du sf
13	Olympic Tower	815 W. Olympic Boulevard	Hotel Condominium Retail Office	373 374 65,074 33,498	rm du sf sf
14	Fashion District Residences	701 S. Maple Avenue	Apartment Commercial	452 13,655	du sf
15	11 <sup>th</sup> and Main	1100 S. Main Street	Apartment Commercial	379 25,810	du sf
16	Fig + Pico	1248 S. Figueroa	Quality	6,573	sf

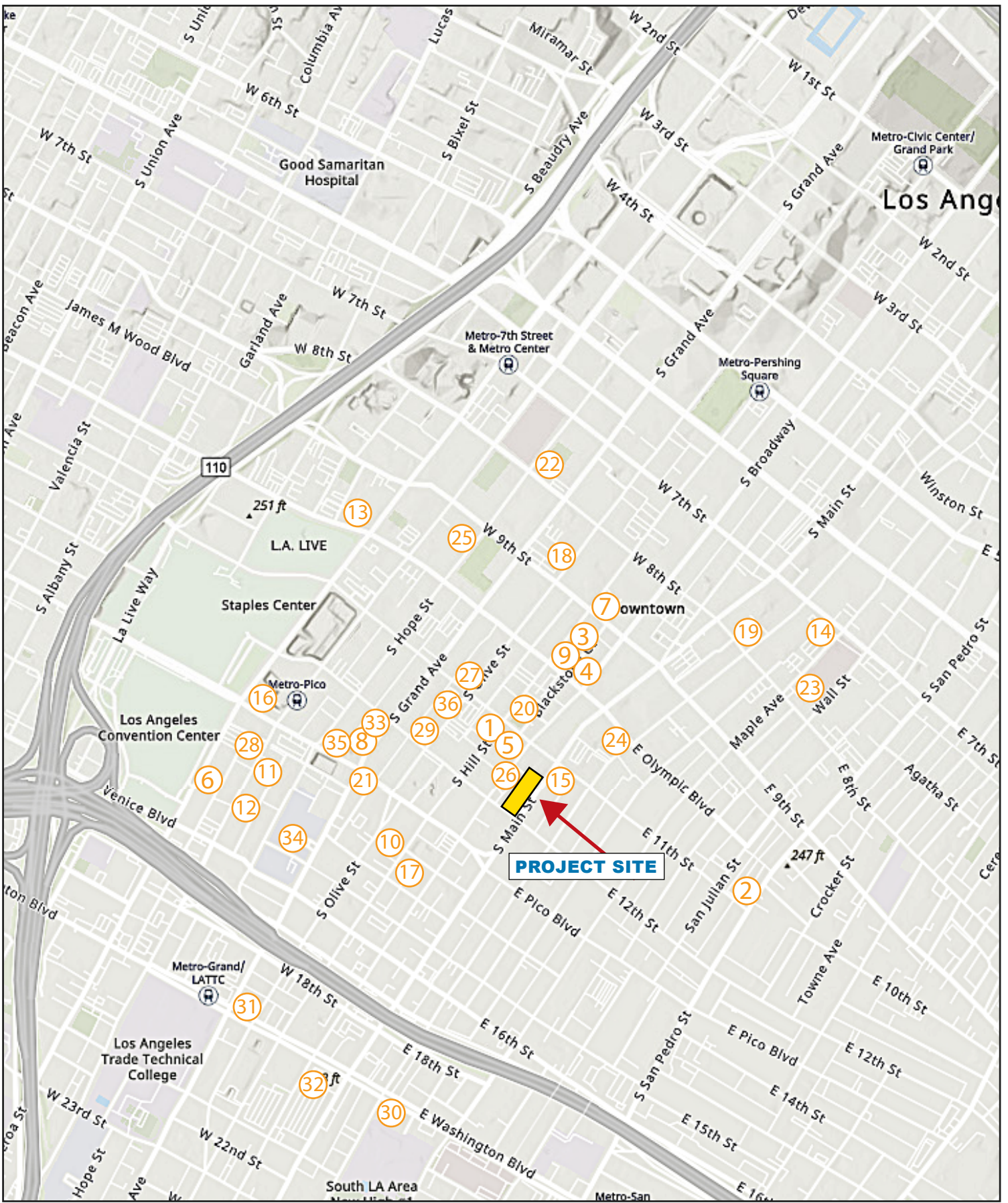
Project Number	Project Name	Location/Address	Project Description	Size	Units
	Conference Center Hotel	Street	Restaurant	6,573	sf
			High-Turnover Restaurant	1,162	rm
17	14 <sup>th</sup> and Hill Mixed-Use	1340 S. Hill Street	Apartment	235	du
			Retail	5,250	sf
			Restaurant	4,000	sf
18	---	845 S. Olive Street	Apartment	208	du
			Retail	810	sf
			Restaurant	1,620	sf
19	Norton Building	755 S. Los Angeles Street	Retail	16,694	sf
			Office	60,243	sf
			Restaurant	26,959	sf
20	Olympic and Hill Tower	1030 S. Hill Street	Apartment	498	du
			Commercial	8,707	sf
21	---	1323 Grand Avenue	Apartment	284	du
			Retail	6,300	sf
22	8 <sup>th</sup> and Hope Tower	754 S. Hope Street	Apartment	409	du
23	Southern California Flower Market	755 S. Wall Street	Apartment	323	du
			Retail	4,400	sf
			Event Space	125	per
			Office	53,200	sf
			Restaurant	4,420	sf
24	---	124 E. Olympic Boulevard	Hotel	149	rm
			Restaurant	6,716	sf
25	---	949 S. Hope Street	Apartment	236	du
			Restaurant	5,060	sf
			Retail	894	sf
26	---	1138 S. Broadway	Hotel	138	rm
27	Crescent Heights Tower	1045 S. Olive Street	Apartment	794	du
			High-Turnover Restaurant	6,252	sf
			Quality Restaurant	6,252	sf
28	---	1323 S. Flower Street	Hotel	132	rm
			Apartment	48	du
			Bar/Restaurant	3,685	sf
29	---	1155 S. Olive Street	Hotel	258	rm
			Retail	1,896	sf
			Restaurant	2,722	sf
30	Washington Boulevard/Los Angeles Street Mixed-Use	220 E. Washington Boulevard	Affordable Housing	111	du
			Apartment	1	du
			Retail	7,300	sf
			Apartment to be removed	(31)	du
			Auto Repair Shop to be removed	(2,322)	sf
31	Grand Metropolitan	233 W. Washington	Apartment	160	du
			Retail	24,000	sf

Project Number	Project Name	Location/Address	Project Description	Size	Units
	Mixed-Use Project	Boulevard			
32	The Reef/LA Mart/SOLA Village	1900 S. Broadway	Condominium Apartment Hotel Retail Office Gallery/Museum Health Club	900 550 210 143,100 180,000 17,600 8,000	du du rm sf sf sf sf
33	---	1201 S. Grand Avenue	Apartment High-Turnover Restaurant General office to be removed	312 7,100 (22,000)	du sf sf
34	California Hospital Medical Center Expansion	1401 S. Grand Avenue	Hospital Retail	148,465 6,000	sf sf
35	Morrison Hotel Development	1246 S. Hope Street	Apartment Hotel Restaurant	258 265 6,000	du rm sf
36	---	1115 S. Olive Street	Apartment Commercial	536 6,153	du sf

*Notes:*

*du = dwelling unit, sf = square feet, ac = acres, rm = rooms, st = seats, stu = students, bed = beds, emp = employees, veh = vehicles, per = persons*

*Source: Crain & Associates, Transportation Impact Study for the Proposed Main Street Tower Project, City of Los Angeles, June 4, 2019; and ZIMAS, website: <http://zimas.lacity.org>, accessed June 2021*



Source: Crain and Associates, June 4, 2019; ZIMAS, 2021.



Figure 2.18  
Related Project Location Map

## D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Proposed Project. The Sustainable Communities Environmental Assessment (SCEA) will analyze impacts associated with the Proposed Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Proposed Project. The discretionary entitlements, reviews, permits and approvals required to implement the Proposed Project include, but are not necessarily limited to, the following:

- Pursuant to **LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82463** to create one master ground lot for a mixed-use project containing 363 residential units and for the export of approximately 5,434 cy of soil and import of approximately 5,434 cy of soil;
- Pursuant to **LAMC Section 12.27, a Zone Variance** to permit 100 percent of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard spaces;
- Pursuant to **LAMC Section 14.5.7, a Transfer of Floor Area Rights (TFAR)** for a transfer of 49,999 square feet of floor area to allow a total floor area of 343,447 square feet with a Floor Area Ratio (FAR) of 7.03:1; and
- Pursuant to **LAMC Section 16.05, a Site Plan Review** for a development project which creates, or results in an increase of 50 or more dwelling units.

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, tree removal permits and sign permits.

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## Section 3. SCEA Criteria and Transit Priority Project Consistency Analysis

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### A. Senate Bill 375

The State of California adopted SB 375, also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate a “sustainable communities strategy” into the regional transportation plans to achieve their respective region’s greenhouse gas emission reduction targets set by California Air Resources Board (ARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project Site.

On September 3, 2020, SCAG’s Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a plan that the Regional Council now calls Connect SoCal. For the SCAG region, the CARB has set greenhouse gas reduction targets at 8 percent below 2005 per capita emissions level by 2020 and 19 percent below 2005 per capita emissions levels by 2035. The Connect SoCal plan outlines strategies to meet the targets set by CARB.<sup>1</sup> By Executive Order G-20-239, approved October 30, 2020, CARB officially determined that the Connect SoCal plan would achieve CARB’s 2020 and 2035 GHG emission reduction targets.<sup>2</sup>

### B. Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to a transit priority project (TPP). A TPP is a project that meets the following four criteria (see Public Resources Code, Section §21155 (a) and (b)):

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the ARB has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets established by ARB;

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<sup>1</sup> Southern California Association of Governments, *Connect SoCal, 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy, Chapter 1: About the Plan, September 3, 2020.*

<sup>2</sup> CARB Executive Order No. G-20-239.

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.

As discussed below, the Proposed Project qualifies as a TPP and meets the qualifying criteria pursuant to Public Resources Code, Section § 21155 as outlined above.

**Consistency with Criterion #1:**

***The Project is consistent with the general use designation, density, and building intensity and applicable policies of specified for the project area in either a sustainable communities strategy or an alternative planning strategy.***

*2016-2040 RTP/SCS*

The 2016-2040 RTP/SCS contains SCAG's regional growth projections, goals, and policies, as well as a regional overview of projected land uses and development standards. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land uses into land use types, then combined the land use types into 35 Place Types and classified subregions into one of three land use development categories (LDCs): Urban, Compact, or Standard. SCAG used these LDCs to describe the conditions that exist and/or are likely to exist within each specific area of the SCAG region<sup>3</sup>. As shown below in Figure 3.1, Forecasted Regional Development Types by Land Development Categories (2012) and Figure 3.2, Forecasted Regional Development Types by Land Development Categories (2040), the Project Site is located within an "Urban" LDC and is forecasted to be in within an Urban LDC in 2040, respectively. Urban LDCs are often found within or directly adjacent to moderate and high-density urban areas. The 2016-2040 RTP/SCS defines the Urban LDC as the following:

*These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.*

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<sup>3</sup> 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, 2016, p. 20-21.



The Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The Proposed Project is an infill project that would provide mixed-use development with multi-family units and neighborhood serving ground floor commercial uses. The Proposed Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and within a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The Project Site is located approximately 0.6 mile walking distance of the Pico Rail Station and approximately 0.9 mile walking distance from the 7<sup>th</sup> Street / Metro Center Station. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. The predominant housing type in the Project Site area is multi-family residential. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

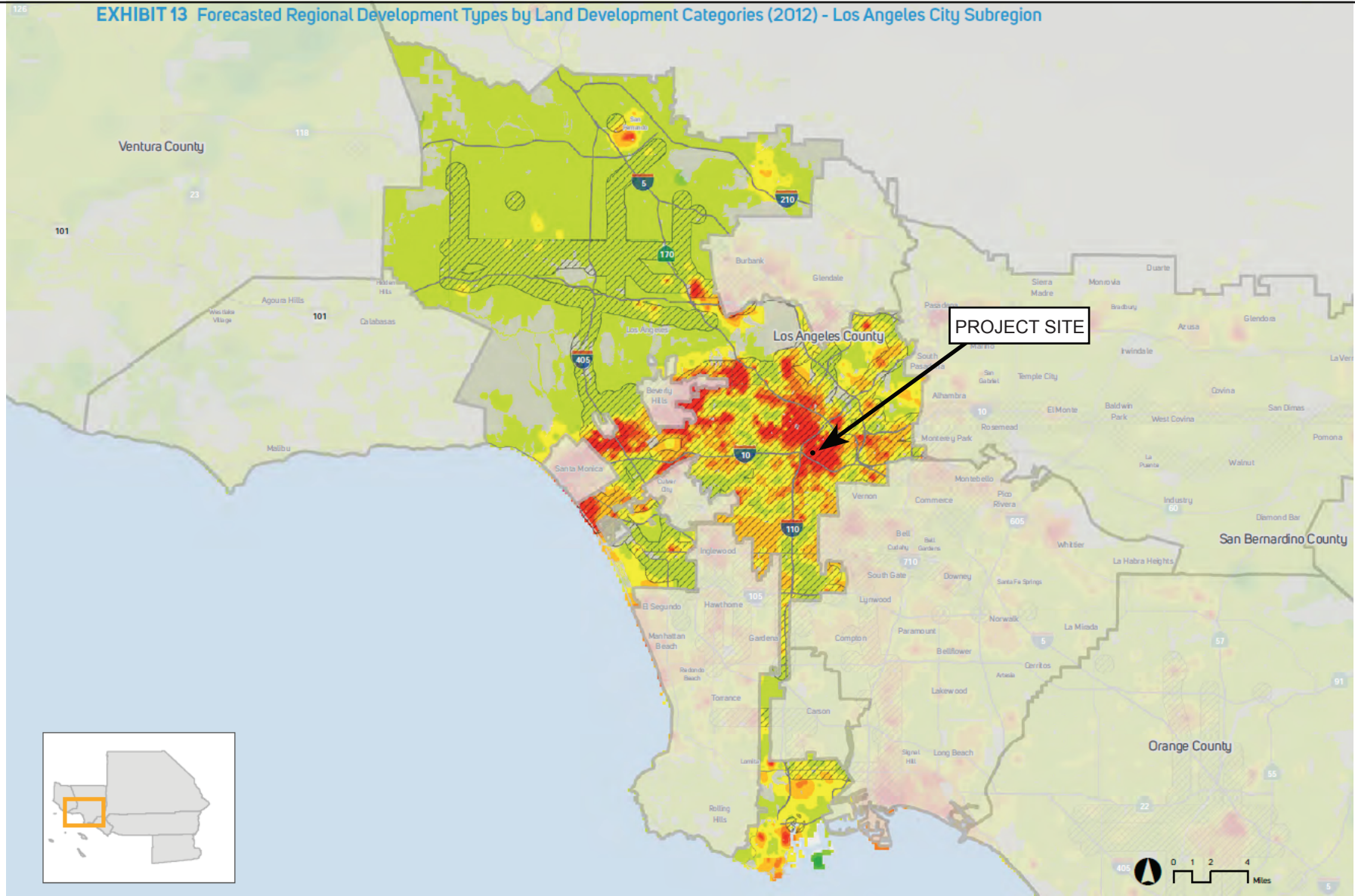
The 2016-2040 RTP/SCS states that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit<sup>4</sup>. The Proposed Project includes a 30-story mixed-use residential and commercial building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail space. The Proposed Project would promote pedestrian activity and bicycling activity by providing landscaping along the public right-of-way and retail spaces within a HQTA. The Proposed Project would also provide vehicle and bicycle parking that is consistent with LAMC requirements. Pursuant to LAMC Section 12.21.A.4, up to ten percent of the required vehicle parking for residential uses and up to 20 percent of required vehicle parking for non-residential uses may be replaced by bicycle parking at a ratio of one vehicle parking space for four bicycle parking spaces. As such, the proposed 373 vehicle parking spaces would be compliant with LAMC requirements and consistent with the bike infrastructure and reduced vehicle parking requirement characteristics that define HQTAs. Therefore, the Proposed Project is similar to other developments within HQTAs and would be consistent with the Urban LDC within the 2016-2040 RTP/SCS.

These LDCs are also included in the updated 2020-2045 RTP/SCS, discussed below.

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<sup>4</sup> 2016-2040 *Regional Transportation Plan / Sustainable Communities Strategy*, 2016, p. 25.

EXHIBIT 13 Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion



HQTA (2012)

California Protected Areas Database (CPAD)

Urban Compact Standard

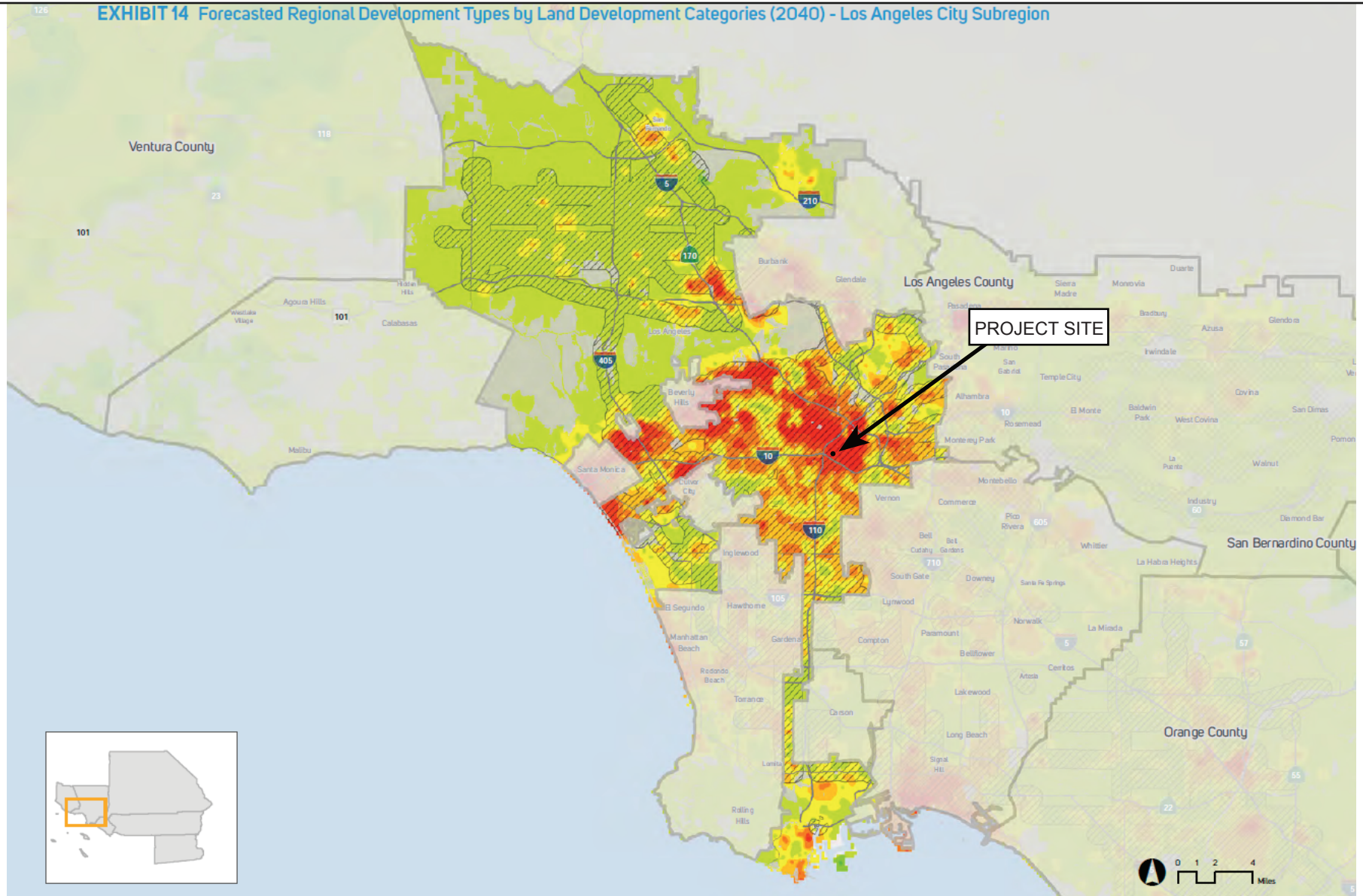
Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

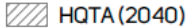


(Source: SCAG, 2015)

Description of LDCs can be found on page 43.

Source: Appendix L - SCAG 2016-2040 RTP/SCS Sustainable Communities Strategy Background Documentation.

EXHIBIT 14 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion



 HQTAs (2040)    
  California Protected Areas Database (CPAD)    
  Urban Compact Standard

Note: The forecasted land use development patterns by LDCs shown are based on Transportation Analysis Zone (TAZ) level data utilized to conduct required modeling analyses. Data at the TAZ level or at a geography smaller than the jurisdictional level are advisory only and non-binding, because SCAG sub-jurisdictional forecasts are not to be adopted as part of the 2016 RTP/SCS. For purposes of qualifying for future funding opportunities and/or other incentive programs, sub-jurisdictional data and/or maps used to determine consistency with the Sustainable Communities Strategy shall only be used at the discretion and with the approval of the local jurisdiction. However, this does not otherwise limit the use of the sub-jurisdictional data and/or maps by SCAG, CTCs, Councils of Governments, SCAG Subregions, Caltrans and other public agencies for transportation modeling and planning purposes. Any other use of the sub-jurisdictional data and/or maps not specified herein, shall require agreement from the Regional Council, respective policy committees and local jurisdictions.

(Source: SCAG 2015)

Description of LDCs can be found on page 43.

Source: Appendix L - SCAG 2016-2040 RTP/SCS Sustainable Communities Strategy Background Documentation.



Figure 3.2  
Forecasted Regional Development Types by Land Development Categories (2040)

## *2020-2045 RTP/SCS (Connect SoCal)*

In September 2020, SCAG’s Regional Council adopted Connect SoCal, the 2020-2045 RTP/SCS of the Southern California Association of Governments (SCAG). The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. On October 30, 2020, CARB accepted SCAG’s quantification of GHG emission reductions from Connect SoCal and determined that Connect SoCal would, if implemented, achieve the 2035 GHG emission reduction targets established by CARB.<sup>5</sup>

### Use Designation, Density, and Building Intensity

SCAG’s Scenario Planning Model (SPM) is a data management, land use planning, and modeling tool. SPM enables the creation and organization of local and regional data, plan and policies, facilitates scenario creation and editing and estimates a wide range of potential benefits resulting from alternative transportation and land use strategies.

SCAG’s SPM employs a series of Place Types to describe the different types of land uses in the region. The Place Types—each comprised of a mix of different building types along with assumptions about characteristics such as the amount of land devoted to streets, parks, and civic areas – represent the complete range of development types and patterns that make up a scenario. These Place Types contain a large amount of information relating to the characteristics of the landscape, including jobs and housing density, urban design, mix of land uses and are intended for modeling purposes.

SCAG also categorizes existing land uses into land use types. Land Development Categories (LDCs)—Urban, Compact, or Standard—represent distinct forms of land use, ranging from dense and walkable mixed-use urban areas well served by transit, to lower-intensity, less walkable places where land uses are segregated and most trips are made via automobile. These LDCs are an aggregation of the 35 Place Types and are used to describe the general conditions within a specific area.<sup>6</sup> The Connect SoCal, Sustainable Communities Strategy Technical Report, forecasts LDCs by county and subregion for 2045; Exhibit 1: Connect SoCal Forecasted Regional Development Pattern.<sup>7</sup>

The Project Site area is located within an “Urban” Land Development Category (LDC). The Urban LDC is the highest density and most intense land development category assessed in the Connect SoCal SCS. The Connect SoCal SCS describes the Urban Land Development Category as:

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<sup>5</sup> CARB Executive Order No. G-20-239.

<sup>6</sup> Connect SoCal, Sustainable Communities Strategy Technical Report, p.44-45.

<sup>7</sup> Connect SoCal, Sustainable Communities Strategy Technical Report, p.33.

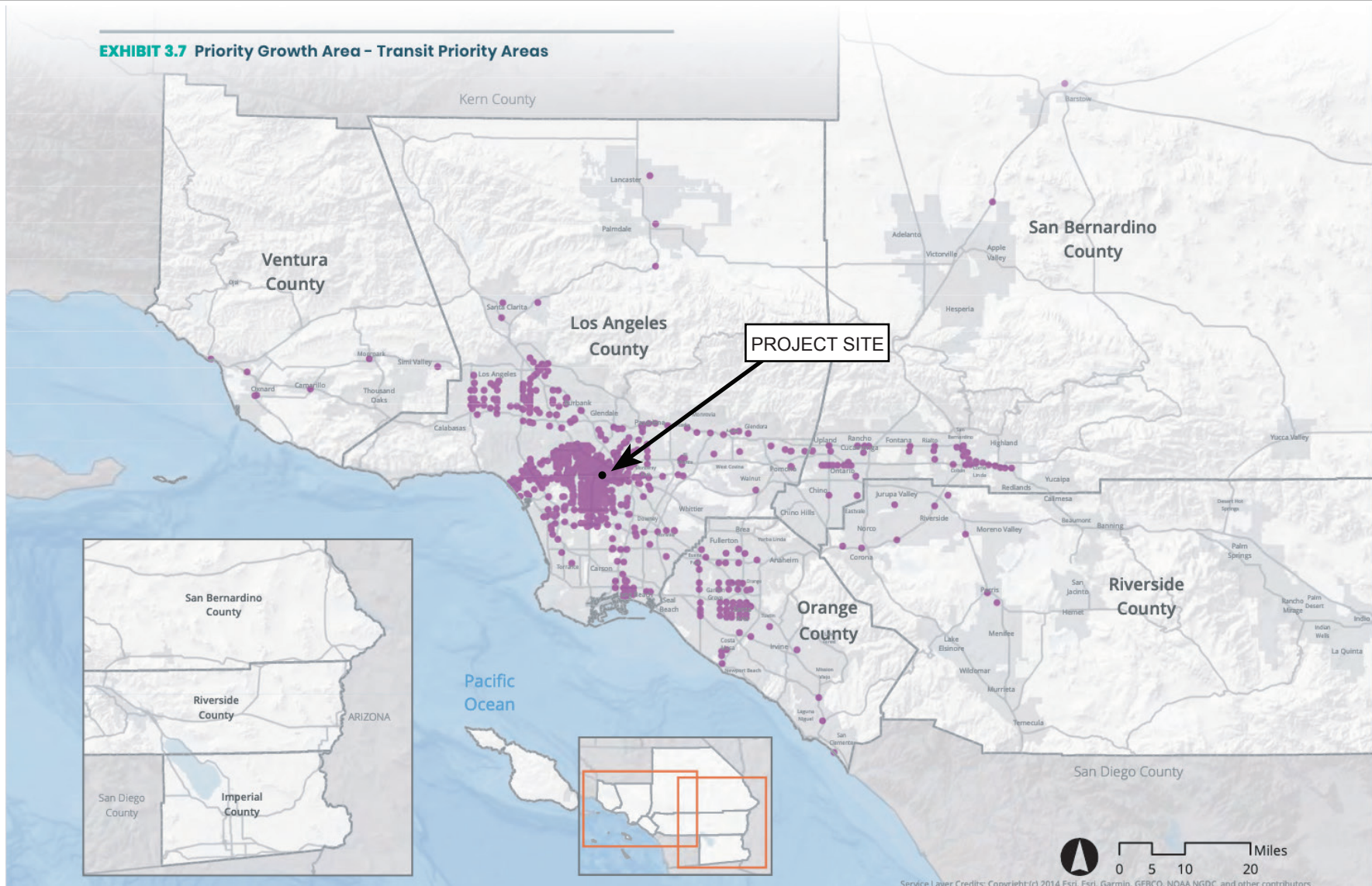
*These areas are often found within and directly adjacent to moderate and high density urban centers. Virtually all 'Urban' growth would be considered infill or redevelopment. The majority of housing units are multifamily and attached single family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. Well-connected street networks and the mix of intensity of uses result in a highly walkable environment. Enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.<sup>8</sup>*

As previously discussed, the Proposed Project would be consistent with the Urban LDC. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, near Downtown Los Angeles. The Proposed Project is an infill project that would provide mixed-use development with multi-family units and neighborhood serving ground floor commercial uses. The Proposed Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and within a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. This is shown below in Figure 3.3, Connect SoCal Transit Priority Areas (2045), which depicts the location of the Project Site in relation to the location of TPAs within the SCAG region for the year 2045, and Figure 3.4, Connect SoCal High Quality Transit Areas (2045), which depicts the location of the Project Site in relation to the location of HQTAs within the SCAG region for the year 2045. The Project Site is located approximately 0.6 mile walking distance of the Pico Rail Station and approximately 0.9 mile walking distance from the 7<sup>th</sup> Street / Metro Center Station. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. The predominant housing type in the Project Site area is multi-family residential. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle. Connect SoCal further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is a mixed-use project, which includes a 30-story mixed-use residential and commercial building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail space. The Proposed Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way and retail spaces. The Proposed Project would provide parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

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<sup>8</sup> *Connect SoCal, Sustainable Communities Strategy Technical Report, p.45.*

**EXHIBIT 3.7 Priority Growth Area - Transit Priority Areas**



Transit Priority Areas (2045)  
 TPA

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

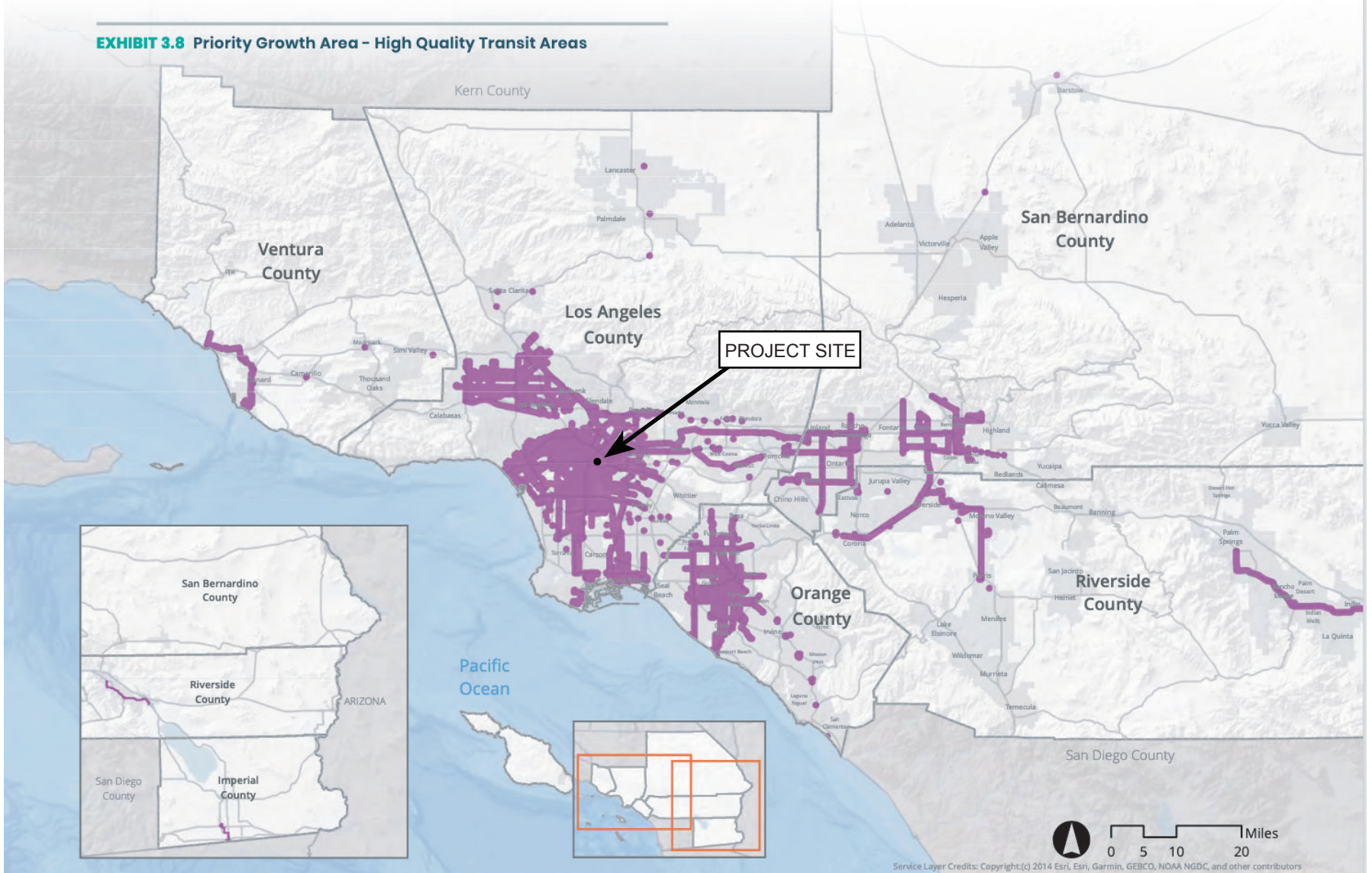
Source: County Transportation Commissions, SCAG, 2019

Source: SCAG Connect SoCal, September 3, 2020.



Figure 3.3  
 Connect SoCal Transit Priority Areas (2045)

**EXHIBIT 3.8 Priority Growth Area - High Quality Transit Areas**



High Quality Transit Areas (2045)  
 HQTA

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTCs using the methodology described in the Transit Technical Report. Major transit stops and HQTCs are extracted from 2045 plan year data of Connect SoCal.

Source: County Transportation Commissions, SCAG, 2019

Source: SCAG Connect SoCal, September 3, 2020.



Figure 3.4  
 Connect SoCal High Quality Transit Areas (2045)

As a Land Use Tool, Connect SoCal identifies Priority Growth Areas (PGAs) throughout the SCAG region where Connect SoCal strategies can be fully realized. These PGAs include Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGA categories account for only four percent of the SCAG region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045.<sup>9</sup> This more compact form of regional development can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the SCAG region's resource areas. As shown below in Figure 3.5, Connect SoCal Forecasted Regional Development Pattern, the Project Site is located within a Priority Growth Area, specifically within a Job Center, HQTA, and Neighborhood Mobility Area (NMA). Job Centers are defined as having a significantly higher employment density than surrounding areas, and that employment growth and residential growth are prioritized in existing Job Centers in order to leverage existing density and infrastructure.<sup>10</sup> NMAs are areas that focus on creating, improving, restoring, and enhancing safe and convenient connections to retail and services, increasing walkability, and which have robust residential to non-residential land use connections and encourage safer multi-modal short trips to reduce reliance on single occupancy vehicles.<sup>11</sup> In addition, the Project Site is located within a Livable Corridor, defined as a strategy comprised of three components (transit improvements, active transportation improvements, and land use policies) to encourage 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.<sup>12</sup>

The Proposed Project would be consistent with these applicable PGA categories (Job Centers, HQTAs, NMAs, and Livable Corridors), as it would create neighborhood serving ground floor retail and multi-family residential as a compact infill development in a highly urbanized area of the City and locate housing and employment opportunities in close proximity to Downtown Los Angeles, with access to a robust transit network, including bus stops with peak commute intervals of 15 minutes or less and located approximately 0.6 mile and 0.9 mile walking distance to the Pico Rail Station and 7<sup>th</sup> Street / Metro Center Station, respectively, in addition to providing on-site Code compliant bicycle parking.

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<sup>9</sup> *Connect SoCal, p.50.*

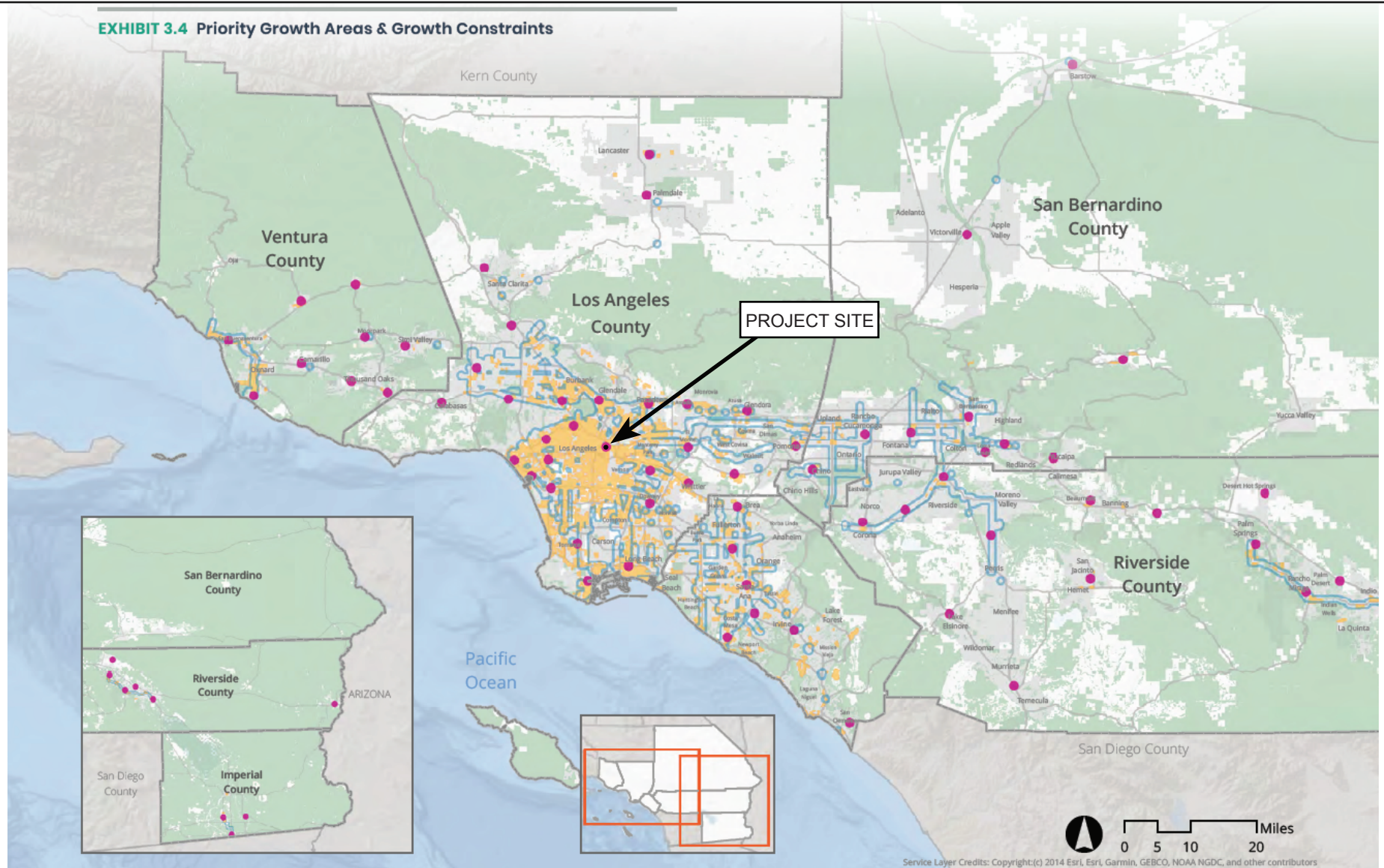
<sup>10</sup> *Ibid.*

<sup>11</sup> *Connect SoCal, p.51-52.*

<sup>12</sup> *Connect SoCal, p.52.*



**EXHIBIT 3.4 Priority Growth Areas & Growth Constraints**



**Priority Growth Areas vs. Regional Growth Constraints**

- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

Source: SCAG Connect SoCal, September 3, 2020.

The Connect SoCal SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space.<sup>13</sup> The Proposed Project is consistent with a range of place types within the Urban LDC.

“Urban Mixed-Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is usually structured below or above ground. Workers, residents, and visitors are well-served by transit, and can walk or bicycle for many of their transportation needs.” The land use mix for this place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multi-family. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 15 to 100 feet, and the gross density ranges from 50 to 500 employees per acre and 40 to 500+ households per acre.<sup>14</sup>

‘Urban Residential’ place types “are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking [is] usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.” The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use and 21 percent open space/civic. The residential mix is 100 percent multi-family. The average total net FAR is 9.0, floors range from 15 - 60, and the gross density ranges from 0 – 50+ employees per acre 75 - 500+ households per acre.<sup>15</sup>

“Industrial/Office/Residential Mixed Use High” is characterized by a wide-ranging, intensely developed mix of uses located in close proximity and set in an automobile-oriented context. Building heights can range from 1 to 15+ stories, and uses can include but are not limited to industrial, warehouses, offices, residential, and retail. The land use mix for this place type is typically approximately 58 percent residential, 36 percent employment, and 6 percent open space. The average total net FAR is 2.0, floors range from 1 – 17, and the gross density ranges from 3 – 250+ employees per acre 18 – 200+ households per acre.<sup>16</sup>

The Proposed Project is a mixed-use development up to 30 stories tall consisting of residential and commercial uses in a highly-urbanized part of Central Los Angeles, on a site that is currently occupied by four commercial buildings and surface parking. Adjacent land uses include commercial/retail, office, industrial uses, mixed-use residential buildings, and surface parking. The Proposed Project is approximately 96 percent residential, and approximately four percent non-residential with a non-residential FAR of 0.26 to 1. The Proposed Project area is

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<sup>13</sup> *Connect SoCal, SCS Technical Report, Appendix 1, SPM Place Types.*

<sup>14</sup> *Connect SoCal SCS Appendix 1, SPM Place Types, p. 1.*

<sup>15</sup> *Ibid.*

<sup>16</sup> *Connect SoCal, SCS Appendix 1, SPM Place Types, p.8.*

supported by high levels of regional and local transit. The Proposed Project would construct approximately 324 dwelling units per acre and will have a total net FAR of 7.03 to 1.

Based on the regional growth projections in the Connect SoCal plan, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). SCAG’s population and housing projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 3.1, below.

**Table 3.1  
SCAG Population and Housing Projections for the  
City of Los Angeles, Los Angeles County, and the SCAG Region**

<b>Population</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
<b>Households</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
<b>Employment</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%
<i>Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.</i>			

The Proposed Project is an infill development project within the Central City Community Plan Area. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.77 million persons by 2045. As shown in Table 3.1, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number

of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

Based on the community's current household demographics (e.g., an average of 2.6 persons per multi-family household for the City of Los Angeles), the construction of 363 additional residential dwelling units would result in an increase in approximately 944 net permanent residents in the City of Los Angeles.<sup>17</sup> Further, the Proposed Project includes a total of 12,500 square feet of ground-floor commercial/retail space. The Proposed Project would generate the need of approximately 33 employees.<sup>18</sup> The proposed increase in housing units and population would be consistent with SCAG's forecast of approximately 426,000 additional households, approximately 837,500 persons, and 287,600 jobs in the City of Los Angeles between 2016 and 2045. As such, the Proposed Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout or that would result in an adverse physical change in the environment.

#### Applicable Policies Specified for the Project Area

The Proposed Project is consistent with SCAG's growth projections for the City, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer Section 6, Sustainable Communities Environmental Assessment, 14. Population and Housing, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's Connect SoCal. Refer to Table 3.2 below for the Proposed Project's consistency analysis.

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<sup>17</sup> *Based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database, the City of Los Angeles' citywide average population for multifamily housing is estimated to be 2.6 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, March 2019).*

<sup>18</sup> *One employee would occupy approximately 383 square feet of retail space. Source: United States Green Building Council, Building Area Per Employee by Business Type, May 13, 2008.*

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
<b>Connect SoCal Goal 1</b> Encourage regional economic prosperity and global competitiveness.	<b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
<b>Connect SoCal Goal 2</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>Consistent.</b> The Project Site is located in a highly urbanized area within the City of Los Angeles within a High Quality Transit Area (as defined by SCAG). The Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTAs as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance from the 7 <sup>th</sup> Street/Metro Center Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
<b>Connect SoCal Goal 3</b> Enhance the preservation, security, and resilience of the regional transportation system.	<b>Not Applicable.</b> This goal is directed towards SCAG and does not apply to the Proposed Project. Nonetheless, Connect SoCal states, “A regional transportation system may be considered ‘sustainable’ if it maintains its overall performance over time in an equitable manner with minimal impact to the environment, while not compromising future transportation needs. Essentially, sustainability refers to how decisions made today impact future generations. One of the measures used to evaluate transportation system sustainability is the total inflation-adjusted cost per capita to maintain our existing regional multimodal transportation system in a state of good repair.” <sup>19</sup> As discussed in the Proposed Project’s Traffic Study (located in Appendix J of this SCEA), Proposed Project would result in a less than significant VMT impact. As such, the Project would not conflict with the RTP/SCS’s goals and policies related to a sustainable regional transportation system.
<b>Connect SoCal Goal 4</b> Increase person and goods movement and travel choices within the transportation system.	<b>Consistent.</b> The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project would provide 195 bicycle spaces to promote travel by bicycle. The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9

<sup>19</sup> SCAG, *Connect SoCal 2020-2045 RTP/SCS, September 2020 (page 135).*

**Table 3.2  
Consistency Analysis with Connect SoCal  
(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
	<p>mile walking distance from the 7<sup>th</sup> Street/Metro Center Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Furthermore, the Proposed Project would be subject to the site plan review requirements of the City of Los Angeles and work with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways.</p>
<p><b>Connect SoCal Goal 5</b> Reduce greenhouse gas emissions and improve air quality.</p>	<p><b>Consistent.</b> The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. As discussed further in Section 6.III, Air Quality, construction and operational generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 6.VI, Energy and 6.VIII, Greenhouse Gas Emissions, the Proposed Project would comply with all regulations and policies aimed at reducing energy and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Proposed Project would not conflict with this Goal.</p>
<p><b>Connect SoCal Goal 6</b> Support healthy and equitable communities.</p>	<p><b>Consistent.</b> The Proposed Project would place dwelling units and ground-floor commercial space in a Transit Priority Area. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 195 bicycle spaces to promote travel by bicycle. Thus, the Proposed Project would reduce vehicle-miles-traveled and help improve air quality. The Proposed Project supports active transportation.</p>
<p><b>Connect SoCal Goal 7</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p><b>Consistent.</b> As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within a HQTAs (as defined by SCAG) and a</p>

**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

Goals and Policies	Consistency Assessment
	<p>Transit Priority Area (as defined by SB 743). The Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance to the 7<sup>th</sup> Street/Metro Center Station. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Proposed Project would provide residents, visitors, and patrons with convenient access to public transit and opportunities for walking and biking. The Proposed Project would develop dwelling units and commercial uses near mass transit and in close proximity to services, retail stores, and employment opportunities. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.</p>
<p><b>Connect SoCal Goal 8</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.</p>	<p><b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.</p>
<p><b>Connect SoCal Goal 9</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p><b>Consistent.</b> The Proposed Project includes 363 residential dwelling units and 12,500 square feet of commercial uses. Given the Proposed Project's location close to transit, the Proposed Project will encourage the utilization of transit as a mode of transportation to and from the Project area. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. Moreover, as discussed in the Proposed Project's Supplemental VMT Analysis (located in Appendix J of this SCEA), the Proposed Project would not create a significant impact with respect to increased VMT.</p>
<p><b>Connect SoCal Goal 10</b> Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p><b>Not Applicable.</b> This Goal is not applicable to the Proposed Project since the Project Site does not contain any natural or agricultural lands. No further discussion is required.</p>
<p><b>Connect SoCal Guiding Principal 1</b> Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.</p>	<p><b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.</p>
<p><b>Connect SoCal Guiding Principal 2</b> 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.</p>	<p><b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. No further discussion is required.</p>
<p><b>Connect SoCal Guiding Principal 3</b> Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.</p>	<p><b>Consistent.</b> The Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTAs and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment</p>

**Table 3.2  
Consistency Analysis with Connect SoCal  
(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
	opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Proposed Project is consistent with this guiding principle.
<b>Connect SoCal Guiding Principal 4</b> Encourage RTP/SCS investments and 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.	<b>Not Applicable.</b> This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupant vehicles. Nevertheless, the Proposed Project is located within a HQTAs and a TPA. The Proposed Project would support public transportation and other alternative methods of transportation (e.g., transit, walking and biking). Therefore, the Proposed Project would not conflict with this Guiding Policy.
<b>Connect SoCal Guiding Principal 5</b> Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. The Proposed Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Section 6.III, Air Quality, air quality emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 6.VI, Energy, and 6.VIII, Greenhouse Gas Emissions, the Proposed Project would comply with all regulations and policies aimed at reducing energy consumption and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Proposed Project would not conflict with this Guiding Policy.
<b>Connect SoCal Guiding Principal 6</b> Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Guiding Principal 7</b> Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	<b>Not Applicable.</b> This Guiding Principal is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.



**Table 3.2**  
**Consistency Analysis with Connect SoCal**  
**(2020-2045 Regional Transportation Plan / Sustainable Community Strategy)**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<b>Connect SoCal Sustainable Communities Strategy 1</b> Focus Growth Near Destinations & Mobility Options	<b>Consistent.</b> As stated previously, the Proposed Project would develop 363 dwelling units and 12,500 square feet of commercial/retail area within a HQTA and a TPA, near downtown Los Angeles. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Proposed Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Proposed Project is consistent with this strategy.
<b>Connect SoCal Sustainable Communities Strategy 2</b> Promote Diverse Housing Choices	<b>Consistent.</b> The Proposed Project includes 363 residential dwelling units and 12,500 square feet of commercial uses. Of the 363 residential dwelling units, the unit mix would include 122 studio units, 133 one-bedroom units, 96 two-bedroom units, and 12 three-bedroom units. Further, the Proposed Project would locate multi-family residential and commercial in close proximity to public transportation, thus providing housing and jobs near transit. The Proposed Project would also include 183 residential bicycle parking spaces and 12 commercial bicycle parking spaces in compliance with LAMC requirements. Thus, development of the Proposed Project would support a reduction in greenhouse gas emissions. Moreover, as discussed in the Proposed Project's Supplemental VMT Analysis (located in Appendix J of this SCEA), the Proposed Project would not create a significant impact with respect to increased VMTs. Thus, the Proposed Project is consistent with this strategy.
<b>Connect SoCal Sustainable Communities Strategy 3</b> Leverage Technology Innovations	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Sustainable Communities Strategy 4</b> Support Implementation of Sustainability Policies	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. No further discussion is required.
<b>Connect SoCal Sustainable Communities Strategy 5</b> Promote a Green Region	<b>Not Applicable.</b> This strategy is directed towards SCAG and does not apply to the Proposed Project. However, this relates to the Connect SoCal Goal 5, above. See response to Connect SoCal Goal 5 and Guiding Principal 5, above. No further discussion is required.
<i>Source: Southern California Association of Governments, Connect SoCal (2020-2045 RTP/SCS), September 2020.</i>	

**Consistency with Criterion #2:**

***The Proposed Project contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent non-residential uses, a floor area ratio of not less than 0.75.***

The Proposed Project includes the construction of a total floor area of 343,447 square feet. The Proposed Project includes 363 dwelling units (which encompasses approximately 330,947 square feet of residential floor area), comprising 96 percent of the total floor area. The Proposed Project includes commercial/retail space (which encompasses approximately 12,500 square feet of non-residential uses), comprising approximately four percent of the total floor area. This results in a non-residential FAR of approximately 0.26:1. As such, the Proposed Project would be consistent with this Criterion.

**Consistency with Criterion #3:**

***The Proposed Project provides a minimum net density of at least 20 units per acre.***

The Project Site is approximately 1.12 acres before street easements and dedications. The Proposed Project includes 363 dwelling units; as such, the Proposed Project provides approximately 324 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

**Consistency with Criterion #4:**

***The Proposed Project is within one-half mile of a Major Transit Stop or High-Quality Transit Corridor included in a regional transportation plan.***

PRC Section 21155 (b) defines a “high-quality transit corridor” as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21155 (b) states that a “major transit stop” is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus (BBB), and the City of Gardena (GTrans). The Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less along Main Street, Los Angeles Street, Broadway, Pico Boulevard, and Olympic Boulevard. The bus lines within a “reasonable walking distance” (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Additionally, at further walking distances, the Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance to the 7<sup>th</sup> Street/Metro Center Station. The Project Site’s proximity to the Pico Rail Station and the 7th Street / Metro Center Station provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. Due to its proximity to the aforementioned bus stops and rail stations, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area. As such, Connect SoCal identifies the Project Site as being within a HQT. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this Criterion.

## C. SB 375 Streamlining Benefits

Pursuant to Public Resources Code, Section §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC Section 21081, shall be eligible for either the provisions of subdivision (b) (sustainable communities’ environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a SCEA, which provides streamlining benefits.

PRC Section §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable. As such streamlining benefits include:

1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC Section §21155.2(b)(1));

2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC Section §21159.28(a));
3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC Section §21159.28(a));
4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (Public Resources Code Section 21159.28(b)).

The City of Los Angeles, Department of City Planning would incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

## D. Scope of Analysis

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

## Section 4. Connect SoCal (2020-2045 RTP/SCS) Program EIR Mitigation Measures

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### A. Incorporation of Applicable Mitigation Measures from Prior EIRs

Public Resources Code Section 21151.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, including the Connect SoCal Final Program Environmental Impact Report for Southern California Association of Governments dated May 2020 (RTP/SCS PEIR) and the September 2020 RTP/SCS PEIR Addendum.

The Mitigation Monitoring and Reporting Program for the Connect SoCal PEIR (SCAG MMRP) does not include project level mitigation measures that are required of the Proposed Project. The SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The City has complied with PRC Section 21151.2 by reviewing all of the suggested mitigation measures in the SCAG MMRP and reviewed them for imposition on the Proposed Project. No mitigation measures were imposed if the Proposed Project was found to be in substantial compliance with the mitigation measure as proposed or if the SCAG MMRP mitigation measure was found not to be relevant. If the Proposed Project was not found to be in substantial compliance or the mitigation measure was found relevant, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure. The City’s analysis is found in Table 4.1 below.

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<u>Aesthetics</u> <i>Scenic</i> <i>Vista/Scenic</i> <i>Resources</i>	<u>Project-Level Mitigation Measure</u> <b>MM-AES-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , 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	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> As set forth in Public Resources Code Section 21099, enacted by Senate Bill 743, 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.”</p> <p>The Proposed Project is a mixed-use residential and commercial infill development project with</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>development.</p> <p>b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</p> <p>c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</p> <p>d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</p> <p>e) Retain or replace trees bordering highways, so that clear-cutting is not evident.</p> <p>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.</p> <p>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;</p> <p>h) Use see-through safety barrier designed (e.g., railings rather than walls)</p>	<p>363 dwelling units and 12,500 square feet of commercial uses. The Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less along Main Street, Los Angeles Street, Broadway, Pico Boulevard, and Olympic Boulevard. The bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express, Santa Monica BBB, and City of Gardena. The bus lines within a “reasonable walking distance” (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Additionally, at further walking distances, the Project Site is located approximately 0.6 mile walking distance from the Pico Station and approximately 0.9 mile walking distance to the 7<sup>th</sup> Street/Metro Center Station. Therefore, the Proposed Project is located in a Transit Priority Area (TPA) as defined in Public Resources Code Section 21099. The Proposed Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.</p>
<p><u>Aesthetics</u> <i>Visual Character/ Quality of Public Views, Conflicts with Zoning</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-AES-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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.</p> <p>b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.</p> <p>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 include setback buffers, landscaping, color, texture, signage,</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> As set forth immediately above, Public Resources Code Section 21099, enacted by Senate Bill 743, 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.” As per ZI No. 2452 and SB 743, aesthetic impacts to visual character/quality “shall not be considered significant impacts on the environment.”</p> <p>Nevertheless, with respect to construction impacts on the visual quality of the Project Site, the Applicant would incorporate PDF-AES-1, which would install temporary fencing around the perimeter of the Project Site for security purposes and block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with applicable regulatory measures would further reduce visual impacts caused during construction of the Proposed Project. Implementation of RCM-AES-1 would ensure</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>and lighting criteria.</p> <p>d) Design projects consistent with design guidelines of applicable general plans.</p> <p>e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.</p> <p>f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:</p> <ul style="list-style-type: none"> <li>o Use transparent panels to preserve views where sound walls would block views from residences;</li> <li>o Use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;</li> <li>o Construct sound walls of materials whose color and texture complements the surrounding landscape and development;</li> </ul> <p>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.</p>	<p>compliance with LAMC Section 14.4.17 regarding maintaining the visibility of required signage and the removal of graffiti:</p> <p><b>RCM-AES-1 Signage on Construction Barriers.</b> Pursuant to LAMC Section 14.4.17 requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 24 hours of occurrence.</p> <p><b>PDF-AES-1 Construction Barrier.</b> The Project shall install temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. The Applicant shall ensure through daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of unauthorized signs, trash, graffiti, etc.) throughout the duration of construction.</p> <p>Also, see discussion in Section 6.I, Aesthetics.</p>
<p><u>Aesthetics</u>  <i>Light/Glare/</i>  <i>Shade</i></p>	<p><u>Project-Level Mitigation Measure</u></p> <p><b>MM-AES-3:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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.</p> <p>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.</p> <p>c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> As set forth above, Public Resources Code Section 21099, enacted by Senate Bill 743, 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." As per ZI No. 2452 and SB 743, aesthetic impacts to light/glare/shade "shall not be considered significant impacts on the environment."</p> <p>Also, see discussion in Section 6.I, Aesthetics.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>lighting.</p> <p>d) Use unidirectional lighting to avoid light trespass onto adjacent properties.</p> <p>e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.</p> <p>f) Provide structural and/or vegetative screening from light-sensitive uses.</p> <p>g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.</p> <p>h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</p> <p>i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</p>	
<p><u>Agricultural Resources</u>  <i>Conversion of Farmland to Non-Agricultural Use</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-AG-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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.</p> <p>b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</p> <p>c) Maintain and expand agricultural land protections such as urban growth boundaries.</p> <p>d) Provide for mitigation fees to support a mitigation bank10 that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</p> <p>e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.</p> <p>f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> No farmland or agricultural activity exists on or in the vicinity of the Project Site. As noted above, the Project Site, as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot.</p> <p>Also, see discussion in Section 6.II, Agriculture and Forestry Resources.</p>
<p><u>Agricultural Resources</u>  <i>Zoning for Ag Use, Williamson Act Contract</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-AG-2:</b> 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:</p> <p>a) Project relocation or corridor realignment to avoid lands</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. As noted above, the Project Site as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot.</p>



**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>in Williamson Act contracts.</p> <p>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.</p>	<p>Also, see discussion in Section 6.II, Agriculture and Forestry Resources.</p>
<p><u>Agricultural Resources</u>  <i>Conflict with Ag Zoning, Rezoning of Forest Land / Loss of Forest Land/ Conversion to Non-Forest Use</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-AG-3:</b> 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:</p> <p>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.</p>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> No farmland, forest land, or agricultural activity exists on or in the vicinity of the Project Site. The Project Site, as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot.</p> <p>Also, see discussion in Section 6.II, Agriculture and Forestry Resources.</p>
<p><u>Agricultural Resources</u>  <i>Conversion of Farmland to Non-Ag Use, Conversion of Forest land to Non-Forest Use</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-AG-4:</b> 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:</p> <p>a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.</p> <p>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.</p> <p>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.</p> <p><b>MM-AG-5:</b> 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</p>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> No farmland, forest land, or agricultural activity exists on or in the vicinity of the Project Site. The Project Site, as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot.</p> <p>Also, see discussion in Section 6.II, Agriculture and Forestry Resources.</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>Agency, may include the following, or other comparable measures:</p> <p>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 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.</p>	
<p><i>Air Quality Potential to Violate AQ Standard, Substantially Contribute to Existing, Projected Air Quality Violation / Cumulative Increase of Criteria Pollutant for Which Project is Non-Attainment / Expose Sensitive Receptors to Substantial Pollutant Concentrations</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-AQ-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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 roadways.  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</p>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> As discussed below in Section 6.III Air Quality, the Proposed Project would not generate construction or operational emissions that exceed the South Coast Air Quality Management District's (SCAQMD's) recommended regional thresholds of significance with implementation of the following regulatory compliance measures that have been identified by the California Air Resources Board (CARB), air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), as applicable and feasible. Although no mitigation is required, compliance with the below-listed regulatory compliance measures substantially conforms to this Mitigation Measure.</p> <p><b>RCM-AQ-1 Site Clearing, Grading and Construction Activities.</b>  Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:</p> <ul style="list-style-type: none"> <li>o All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions</li> </ul>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>k) Ensure that all construction equipment is properly tuned and maintained.</p> <p>l) Minimize idling time to 5 minutes or beyond regulatory requirements – saves fuel and reduces emissions.</p> <p>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.</p> <p>n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.</p> <p>o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.</p> <p>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.</p> <p>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</p>	<p>and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.</p> <ul style="list-style-type: none"> <li>○ The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.</li> <li>○ All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.</li> <li>○ All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.</li> <li>○ All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.</li> <li>○ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.</li> <li>○ Trucks having no current hauling activity shall not idle but be turned off.</li> </ul> <p><b>RCM-AQ-2</b> The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.</p> <p><b>RCM-AQ-3</b> The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).</p> <p><b>RCM-AQ-4</b> In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.</p> <p><b>RCM-AQ-5</b> In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled,</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>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-emissions heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p> <p>s) Projects located within AB 167 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>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.</p> <p>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).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.</li> <li>- 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.</li> </ul> <p>w) As applicable for port projects, the following measures should be considered:</p> <ul style="list-style-type: none"> <li>- Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).</li> <li>- Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.</li> <li>- 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.</li> <li>- Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.</li> <li>- Maximize participation in the Port of Los Angeles’ Vessel Speed Reduction Program or the Port of Long Beach’s Green Flag Initiation Program in</li> </ul>	<p>compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.</p> <p><b>RCM-AQ-6</b> The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.</p> <p><b>RCM-AQ-7</b> The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.</p> <p><b>RCM-AQ-8</b> The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.</p> <p><b>RCM-AQ-9</b> New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.</p> <p>Also, see discussion in Section 6.III, Air Quality.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.</p> <ul style="list-style-type: none"> <li>- Encourage the participation in the Green Ship Incentives.</li> <li>- Offer Incentives to encourage the use of on-dock rail.</li> </ul> <p>x) As applicable for rail projects, the following measures should be considered:</p> <ul style="list-style-type: none"> <li>- Provide the highest incentives for electric locomotives that meet Tier 4 emission standards.</li> </ul> <p>y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency or 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.</p> <p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.</li> <li>- Disclose the potential increase in energy costs for running the HVAC system to prospective residents.</li> <li>- Provide information to residents on where MERV filters can be purchased.</li> <li>- Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.</li> <li>- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.</li> <li>- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.</li> <li>- Set criteria for assessing progress in installing and replacing the enhanced filtration units; and</li> <li>- Develop a process for evaluating the effectiveness of the enhanced filtration units.</li> </ul> <p>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p> <p>bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:</p> <ul style="list-style-type: none"> <li>• Diesel nonroad vehicles on site for more than 10 total days shall have either (1)</li> </ul>	

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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%.</p> <ul style="list-style-type: none"> <li>• 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%.</li> <li>• Nonroad diesel engines on site shall be Tier 2 or higher.</li> <li>• Diesel nonroad construction equipment on site for more than 10 today 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.</li> <li>• Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.</li> <li>• 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.</li> <li>• 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:             <ul style="list-style-type: none"> <li>○ Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.</li> <li>○ 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.</li> <li>○ For the emission control</li> </ul> </li> </ul>	

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.</p> <ul style="list-style-type: none"> <li>• 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 impacts on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.</li> <li>• The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:             <ul style="list-style-type: none"> <li>○ Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.</li> <li>○ Any problems with the equipment or emission controls.</li> <li>○ Certified copies of fuel deliveries for the time period that identify:                 <ul style="list-style-type: none"> <li>▪ Source of supply</li> <li>▪ Quantity of fuel</li> <li>▪ Quantity of fuel, including sulfur content (percent by weight)</li> </ul> </li> </ul> </li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>• Install programmable thermostat timers</li> <li>• Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).</li> <li>• Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the <i>Energy Star and Other Climate Protection Partnerships</i> Annual Reports.)</li> <li>• Install higher efficacy public street and area lighting</li> <li>• Limit outdoor lighting requirements</li> <li>• Replace traffic lights with LED traffic</li> </ul>	

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 Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
	<p>lights</p> <ul style="list-style-type: none"> <li>• Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power</li> <li>• Utilize a combined heat and power system</li> <li>• Establish methane recovery in Landfills and Wastewater Treatment Plants.</li> <li>• Locate project near bike path/bike lane</li> <li>• Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block length, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.</li> <li>• Provide traffic calming measures, such as:               <ul style="list-style-type: none"> <li>○ Marked crosswalks</li> <li>○ Count-down signal timers</li> <li>○ Curb extensions</li> <li>○ Speed tables</li> <li>○ Raised crosswalks</li> <li>○ Raised intersections</li> <li>○ Median islands</li> <li>○ Tight corner radii</li> <li>○ Roundabouts or mini-circles</li> <li>○ On-street parking</li> <li>○ Chicanes/chokers</li> </ul> </li> <li>• Create urban non-motorized zones</li> <li>• Provide bike parking in non-residential and multi-unit residential projects</li> <li>• Dedicate land for bike trails</li> <li>• Limit parking supply through:               <ul style="list-style-type: none"> <li>○ Elimination (or reduction) or minimum parking requirements</li> <li>○ Creation of maximum parking requirements</li> <li>○ Provision of shared parking</li> </ul> </li> <li>• Require residential area parking permit.</li> <li>• Provide ride-sharing programs               <ul style="list-style-type: none"> <li>○ Designate a certain percentage of parking spacing for ride sharing vehicles</li> <li>○ Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles</li> </ul> </li> </ul>	



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Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>○ Providing a web site or messaging board for coordinating rides</li> <li>○ Permanent transportation management association membership and finding requirement.</li> </ul>	
<p><u>Biological Resources</u> <i>Adverse Effect on Candidate, Sensitive, or Special Status Species / Adverse Effect on Riparian Habitat or Other Sensitive Natural Community / Adverse Effect on Wetlands / Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-BIO-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.</li> <li>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 Endangered Species Act, Section 2081 of the California Endangered Species Act 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: <ul style="list-style-type: none"> <li>○ Impact minimization strategies</li> <li>○ Contribution of in-lieu fees for in-kind conservation and mitigation efforts</li> <li>○ Use of in-kind mitigation bank credits</li> <li>○ Funding of research and recovery efforts</li> <li>○ Habitat restoration</li> <li>○ Establishment of conservation easements</li> <li>○ Permanent dedication of in-kind habitat</li> </ul> </li> <li>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.</li> <li>d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or non-native habitat wherever feasible, so as to avoid or minimize impacts to these species</li> <li>e) Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.</li> <li>f) Retain a qualified botanist to document the presence or absence of special status plants before project</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site does not contain any critical habitat or support any species identified or designated 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. The Project Site is located in an urbanized area of the City. The Project Site is improved with four commercial/retail buildings and a paved surface parking lot. The Project Site is bordered by nine street trees, all of which would be removed and replaced.</p> <p>Nevertheless, the City has required the following regulatory compliance measures which are consistent with the RTP/SCS PEIR mitigation measures, as it is equal to or more effective than RTP/SCS PEIRMM-BIO-1. with regard to avoiding potentially significant effects related to nesting native birds that are in the jurisdiction and responsibility of the City:</p> <p><b>RCM-BIO-1 Tree Removal (Public Right-of-Way).</b> Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. The number, type and size of replacement trees to be provided in the public right-of-way shall be provided per the current Urban Forestry Division standards and to the satisfaction of the Department of Public Works.</p> <p><b>RCM-BIO-2 Habitat Modification (Nesting Native Birds).</b> Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season</p>

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Topic	Measure	Applicability to the Project
	<p>implementation.</p> <p>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.</p> <p>h) Appoint a qualified biologist to monitor implementation of mitigation measures.</p> <p>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.</p> <p>j) Develop an invasive species control plan associated with project construction</p> <p>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</p> <p>l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</p> <p>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.</p> <p>n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.</p> <p>o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.</p>	<p>which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).</p> <p>If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:</p> <ul style="list-style-type: none"> <li>o Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.</li> <li>o If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.</li> <li>o Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.</li> <li>o The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project</li> </ul> <p>Also, see discussion in Section 6.III, Biological Resources.</p>

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Topic	Measure	Applicability to the Project
<p>Biological Resources            Adverse Effect on Riparian Habitat or Other Sensitive Natural Community / Adverse Effect on Wetlands / Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</p>	<p>Project-Level Mitigation Measure  <b>MM-BIO-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>f) Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.</li> <li>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.</li> <li>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</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site does not contain any critical habitat or support any species identified or designated 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. The Project Site is located in an urbanized area of the City. The Project Site is improved with four commercial/retail buildings and a paved surface parking lot.</p> <p>Also, see discussion in Section 6.III, Biological Resources.</p>

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**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>appropriate compensatory mitigation, where required.</p> <ul style="list-style-type: none"> <li>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</li> <li>j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.</li> <li>k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.</li> <li>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.</li> <li>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.</li> <li>n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.</li> <li>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.</li> <li>p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.</li> <li>q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</li> <li>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.</li> </ul>	
<p><u>Biological Resources</u>  <i>Adverse Effect on Wetlands / Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting</i></p>	<p><u>Project-Level Mitigation Measure</u>  See <b>MM-BIO-1</b> and <b>MM-BIO-2</b>.</p> <p><b>MM-BIO-3:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies.</p> <p>Also, see discussion in Section 6.III, Biological</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<p><i>Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p>a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Section 404 and 401 of the CWA, wherever practicable and feasible.</p> <p>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.</p> <p>c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally 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 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:</p> <ul style="list-style-type: none"> <li>o Permittee-responsible mitigation</li> <li>o Contribution of in-kind-in-lieu fees</li> <li>o Use of in-kind mitigation bank credits</li> <li>o Where avoidance is determined to be infeasible and</li> </ul> <p>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:</p>	<p>Resources.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>○ Avoidance</li> <li>○ Impact Minimization</li> <li>○ On-site alternatives</li> <li>○ Off-site alternatives</li> </ul> <p>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 a formal wetland delineation.</p>	
<p><u>Biological Resources</u>  <i>Interfere with the Movement of Species / Conflict with Local Policies or Ordinances</i>  <i>Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p><u>Project-Level Mitigation Measure</u>  See <b>MM-BIO-1</b> through <b>MM-BIO-3</b>.  <b>MM-BIO-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.</li> <li>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.</li> <li>g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.</li> <li>h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site is not located within or adjacent to migratory fish, wildlife species, or established native resident and/or migratory wildlife corridors, and native wildlife nursery sites. The Project Site is improved with four commercial/retail buildings and a paved surface parking lot and located in an urbanized area of the City.</p> <p>Also, see discussion in Section 6.III, Biological Resources.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.</p> <p>k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</p> <p>l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.</p> <p>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.</p> <p>n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>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 <b>MM-BIO-1</b> where applicable:</p> <ul style="list-style-type: none"> <li>○ Wildlife movement in buffer zones</li> <li>○ Corridor realignment</li> <li>○ Appropriately spaced breaks in center barriers</li> <li>○ Stream rerouting</li> <li>○ Culverts</li> <li>○ Creation of artificial movement corridors such as freeway under- or overpasses</li> <li>○ Other comparable measures</li> </ul> <p>p) Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</p> <p>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.</p> <p>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</p>	

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>developed areas, particularly those that are adjacent to or go through natural habitats.</p> <p>s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> <li>- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.</li> <li>- Design exterior lighting to confine illumination to the project site</li> <li>- Provide structural and/or vegetative screening from light-sensitive uses.</li> <li>- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</li> <li>- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</li> </ul> <p>t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> <li>- Install temporary noise barriers during construction.</li> <li>- 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.</li> <li>- 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.</li> <li>- 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. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</li> <li>- 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.</li> </ul>	



**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>- 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, whenever feasible) for project construction.</li> <li>- Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</li> <li>u) Require large buffers between sensitive uses and freeways.</li> <li>v) Create corridor redundancy to help retain functional connectivity and resilience.</li> </ul>	
<p><u>Biological Resources</u>  <i>Conflict with Local Policies or Ordinances</i>  <i>Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p><u>Project-Level Mitigation Measure</u>  See <b>MM-BIO-1</b> through <b>MM-BIO-4</b>.  <b>MM-BIO-5:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Project Site is completely paved and developed, and no significant vegetation exists, including protected trees. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site. Per the Tree Report prepared by The Tree Resource on October 18, 2018, there are nine (9) trees in the right-of-way adjacent to the Project Site: eight (8) trees along Main Street and one (1) tree along 12<sup>th</sup> Street. None of these trees are protected by the City’s Protected Tree Ordinance. As such, none of the Mitigation Measures that pertain to local policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance, are applicable.</p>

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>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 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.</p> <p>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.</p> <p>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</p> <p>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:</p> <ul style="list-style-type: none"> <li>○ Avoidance strategies</li> <li>○ Contribution of in-lieu fees</li> <li>○ Planting of replacement trees</li> <li>○ Re-landscaping areas with native vegetation post-construction</li> <li>○ Other comparable measures developed in consultation with local agency and certified arborist.</li> </ul>	

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<p><u>Biological Resources</u>  <i>Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan</i></p>	<p><u>Project-Level Mitigation Measure</u>            See <b>MM-BIO-1</b> through <b>MM-BIO-5</b>.</p> <p><b>MM-BIO-6:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.</li> <li>b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.</li> <li>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 <b>SMM-BIO-2</b>, where applicable.</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> No locally designated natural communities are known to occur on or adjacent to the Project Site. Therefore, none of the Mitigation Measures that pertain to Habitat Conservation Plans or Natural Community Conservation Plans are applicable to the Proposed Project.</p>
<p><u>Cultural Resources</u>  <i>Substantial Adverse Change in Historical Resource / Substantial Adverse Change in the Significance of Archaeological Resource</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-CULT-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.</li> <li>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.</li> <li>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</li> </ul>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure through compliance with regulatory compliance measures.</b> The Project does not involve and will not affect any historic resources. According to the Historic Resource Assessment prepared by Historic Preservation Consulting (see Appendix C.1 of this SCEA), all four buildings on the Project Site do not meet the criteria thresholds required for eligibility in the National Register of Historic Places or the California Register of Historic Resources. The nearest historic resources include the Herald-Examiner Building at 1111 South Broadway and the Commercial Club Building at 1100 South Broadway, approximately 205 feet northwest of the Project Site and 105 feet north of the Project Site, respectively. The Proposed Project would have no direct impacts on these two historic buildings. There are no historical resources on the Project Site, and no historic resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project does not abut any historic resources and would not result in a substantial adverse change</p>

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**Applicability of Project-Level Mitigation Measures from**  
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Topic	Measure	Applicability to the Project
	<p>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:</p> <ul style="list-style-type: none"> <li>o 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.</li> <li>o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.</li> </ul> <p>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 construction activities and be provided to the Lead Agency for review and approval.</p> <p>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.</p> <p>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</p>	<p>to the immediate surroundings of these two historic buildings such that they would no longer be eligible for listing under national, state, or local landmark designation programs.</p> <p>Further, it is not anticipated that the Project Site contains significant archaeological resources. The Project Site has been previously developed and graded, and the Project Site and immediate surrounding areas do not contain any known archaeological resources. This is supported by the Archaeological Resource Assessment prepared by Dudek (see Appendix C.2 to this SCEA) and a Tribal Cultural Resources Report prepared by Dudek (see Appendix K to this SCEA), both of which concluded from a California Historical Resources Information System (CHRIS) records search and through a Native American Heritage Commission Sacred Lands File review request that there is no substantial evidence to support a conclusion that the Proposed Project would have a significant impact on archaeological resources or tribal cultural resources, respectively. However, if an unexpected discovery should occur, compliance with the following regulatory compliance measure is consistent with the SCAG RTP/SCS Program EIR MM-CULT-1 in avoiding potential impacts to inadvertent finds of historic or archaeological cultural resources:</p> <p><b>RCM-CR-1 Archaeological.</b> In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.</p> <p>Compliance with the above-listed regulatory compliance measure substantially conforms to this Mitigation Measure and would reduce any potentially significant impacts.</p> <p>Also, see discussion regarding Tribal Cultural</p>

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>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 records indicate that no previous survey has been conducted, 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.</p> <p>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, appropriate resource-specific mitigation measures should be established by the lead agency 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 reinterment in an area designated by the tribe.</p> <p>j) If a record search or archaeological assessment indicates that the project is located in an area sensitive for archaeological resources, as determined</p>	<p>Resources in Section 6.XVIII.</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
	<p>by the Lead Agency in consultation with a qualified archaeologist, retain an archaeological 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</p> <p>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.</p> <p>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. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p>	
<p><u>Cultural Resources</u> <i>Disturb Human Remains, Those Interred Outside Cemeteries</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-CULT-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>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.</p> <p>b) If any discovered remains are of Native American origin:</p> <ul style="list-style-type: none"> <li>o 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</li> </ul>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> The Project Site has been previously developed and graded, and the Project Site and immediate surrounding areas do not contain any known archaeological resources. This is supported by the Archaeological Resource Assessment prepared by Dudek (see Appendix C.2 to this SCEA) and a Tribal Cultural Resources Report prepared by Dudek (see Appendix K to this SCEA), both of which concluded from a California Historical Resources Information System (CHRIS) records search and through a Native American Heritage Commission Sacred Lands File review request that there is no substantial evidence to support a conclusion that the Proposed Project would have a significant impact on archaeological resources or tribal cultural resources, respectively. However, if an unexpected discovery should occur, compliance with the following regulatory compliance measure is capable of avoiding or reducing significant impacts on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>excavate the human remains.</p> <ul style="list-style-type: none"> <li>o 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.</li> </ul>	<p>Agencies:</p> <p><b>RCM-CR-2 (Human Remains):</b> If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> <li>o Stop immediately and contact the County Coroner:  1104 N. Mission Road  Los Angeles, CA 90033  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)</li> <li>o If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).</li> <li>o The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.</li> <li>o 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.</li> <li>o If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.</li> </ul>
<p><u>Geology and Soils</u>  <i>Result in Substantial Soil Erosion or Loss of Topsoil</i></p>	<p><b>Project-Level Mitigation Measure</b>  <b>MM-GEO-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources. Such measures may include the following or other comparable measures identified by the Leady Agency:</p> <ul style="list-style-type: none"> <li>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.</li> <li>b) Consistent with the requirements of the State</li> </ul>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> This is supported by the Geotechnical Investigation prepared by Geotechnologies, Inc., (see Appendix E.1 of this SCEA), which concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the Proposed Project, provided the recommendations presented in the Geotechnical Investigation were followed and implemented during design and construction. The Proposed Project would comply with the recommendations of the Geotechnical Investigation. Additionally, the Proposed Project would be required to comply with current engineering standards and the conditions</p>

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Topic	Measure	Applicability to the Project
	<p>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.</p> <p>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.</p> <p>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.</p>	<p>contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, as it may be subsequently amended or modified (see Section 6.VII, Geology and Soils, of this SCEA).</p> <p>Further, the Proposed Project is subject to the following regulatory compliance measures, which are capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies:</p> <p><b>RCM-GEO-1 Geology (Erosion/Grading/Short-Term Construction Impacts).</b> The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.</p> <p><b>RCM-GEO-2 Geology (Erosion/Grading/Short-Term Construction Impacts).</b> Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>o Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.</li> <li>o Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.</li> </ul> <p><b>See also RCM-HYD-1 (National Pollutant Discharge Elimination System General Permit).</b></p>
<p><u>Geology and Soils</u> <i>Directly or Indirectly Destroy Unique</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-GEO-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should</p>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure through compliance with regulatory compliance</b></p>



**Table 4.1  
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Topic	Measure	Applicability to the Project
<p><i>Paleontological Resource or Site or Unique Geologic Feature</i></p>	<p>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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</li> <li>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:               <ol style="list-style-type: none"> <li>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.</li> <li>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</li> </ol> </li> </ol>	<p><b>measures.</b> It is not anticipated that the Project Site contains unique paleontological resources or sites and unique geologic features. The Project Site and immediate surrounding areas do not contain any unique geologic features or known vertebrate paleontological resources. This is supported by correspondence received from the Natural History Museum of Los Angeles County (see Appendix E.2 of this SCEA), which concluded in the Paleontological Records Search that no vertebrate fossil localities lie directly within the Project Site boundaries. Younger Quaternary Alluvium surface deposits are present on the Project Site, which usually do not contain significant fossil vertebrates in the upper layers. The Proposed Project does not propose subterranean levels, but it will disturb a few feet below the ground surface in order to build proper building foundations. If unexpected discovery should occur, compliance with the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features, are equal to or more effective than this mitigation measure:</p> <p><b>RCM-GEO-3 Paleontological.</b> Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:</p> <ul style="list-style-type: none"> <li>• The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.</li> <li>• The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.</li> <li>• The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.</li> <li>• Project development activities may</li> </ul>

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Topic	Measure	Applicability to the Project
	<p>adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.</p> <p>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.</p> <p>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.</p> <p>e) Avoid routes and project designs that would permanently alter unique geological features.</p> <p>f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</p> <p>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.</p> <p>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.</p>	<p>resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.</p> <p>Compliance with the above-listed regulatory compliance measure substantially conforms to this Mitigation Measure and would reduce any potentially significant impacts.</p>
<p><u>Greenhouse Gases</u> <i>Directly or Indirectly Generate GHG Emissions that May Have Significant Impact on Environment / Conflict with Applicable Plan, Policy, Regulation</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-GHG-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into</p>	<p><b>The Project already substantially complies with this Mitigation Measure through project design features and compliance with regulatory compliance measures.</b> It incorporates the following project design features and is subject to various regulatory compliance measures, that are capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction</p>

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Topic	Measure	Applicability to the Project
	<p>project design including:</p> <ul style="list-style-type: none"> <li>i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.</li> <li>iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.</li> <li>iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.</li> <li>v. Use high-efficiency lighting and cooking devices.</li> <li>vi. Incorporate passive solar design.</li> <li>vii. Use high-reflectivity building materials and multiple glazing.</li> <li>viii. Prohibit gas-powered landscape maintenance equipment.</li> <li>ix. Install electric vehicle charging stations.</li> <li>x. Reduce wood burning stoves or fireplaces.</li> <li>xi. Provide bike lanes accessibility and parking at residential developments</li> </ul> <p>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.</p> <p>c) Include off-site measures to mitigate a project's emissions.</p> <p>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:</p> <ul style="list-style-type: none"> <li>i. Use energy and fuel-efficient vehicles and equipment;</li> <li>ii. Deployment of zero- and/or near zero emission technologies;</li> <li>iii. Use lighting systems that are energy efficient, such as LED technology;</li> <li>iv. Use the minimum feasible amount of GHG-emitting construction materials;</li> <li>v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;</li> <li>vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;</li> <li>vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;</li> <li>viii. Incorporate design measures to reduce water consumption;</li> <li>ix. Use lighter-colored pavement where feasible;</li> </ul>	<p>and authority of CARB, local air districts, and/or Lead Agencies. Such features and measures include the following:</p> <p><b>RCM-GHG-1</b> The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.</p> <p><b>RCM-GHG-2</b> The Project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. 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.</p> <p><b>RCM-GHG-3</b> As mandated by the LA Green Building Code, the Project is 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.</p> <p><b>RCM-GHG-4</b> The Project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485.</p> <p><b>RCM-GHG-5</b> Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.</p> <p><b>RCM-GHG-6</b> The Project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and</p>

**Table 4.1  
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Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>x. Recycle construction debris to maximum extent feasible;</li> <li>xi. Plant shade trees in or near construction projects where feasible; and</li> <li>xii. Solicit bids that include concepts listed above.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>i. Promote transit-active transportation coordinated strategies;</li> <li>ii. Increase bicycle carrying capacity on transit and rail vehicles;</li> <li>iii. Improve or increase access to transit;</li> <li>iv. Increase access to common goods and services, such as groceries, schools, and day care;</li> <li>v. Incorporate affordable housing into the project;</li> <li>vi. Incorporate the neighborhood electric vehicle network;</li> <li>vii. Orient the project toward transit, bicycle and pedestrian facilities;</li> <li>viii. Improve pedestrian or bicycle networks, or transit service;</li> <li>ix. Provide traffic calming measures;</li> <li>x. Provide bicycle parking;</li> <li>xi. Limit or eliminate park supply through: <ul style="list-style-type: none"> <li>o Elimination (or reduction) of minimum parking requirements</li> <li>o Creation of maximum parking requirements</li> <li>o Provision of shared parking.</li> </ul> </li> <li>xii. Unbundle parking costs;</li> <li>xiii. Provide parking cash-out programs;</li> <li>xiv. Implement or provide access to commute reduction program;</li> </ul> <p>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;</p> <p>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</p> <p>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:</p> <ul style="list-style-type: none"> <li>i. Provide car-sharing, bike sharing programs;</li> <li>ii. Provide transit passes;</li> <li>iii. Shift single occupancy vehicle trips to</li> </ul>	<p>reduce water usage.</p> <p>Indoor Water Use. Pursuant to Section 99.04.303.4 of the LAMC, a 20% reduction in the overall use of potable water within a building shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the Los Angeles Building Standards.</p> <p>Outdoor Water Use. Pursuant to Section 99.04.304.1, a water budget shall be developed for landscape irrigation use that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Additionally, in new residential construction or building addition or alteration over 500 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the criteria specified in Section 99.04.304.2 and meet manufacturer's recommendations. Furthermore, outdoor water metering, swimming pool covers, and exterior faucets are regulated under the LAMC Section 99.04.304 for outdoor water usage.</p>

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Topic	Measure	Applicability to the Project
	<p>carpooling or vanpooling, for example providing ride-matching services;</p> <ul style="list-style-type: none"> <li>iv. Provide incentives or subsidies that increase the use of modes other than single-occupancy vehicles;</li> <li>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;</li> <li>vi. Provide employee transportation coordinators at employment sites;</li> <li>vii. Provide a guaranteed ride home service to users of non-auto modes.</li> </ul> <ul style="list-style-type: none"> <li>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;</li> <li>j) Land use siting and design measures that reduce GHG emissions, including:           <ul style="list-style-type: none"> <li>i. Developing on infill and brownfield sites;</li> <li>ii. Building compact and mixed-use developments near transit;</li> <li>iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>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</li> <li>v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse.</li> </ul> </li> <li>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.</li> <li>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.</li> <li>m) Encourage telecommuting and alternative work schedules, such as:           <ul style="list-style-type: none"> <li>i. Staggered starting times</li> <li>ii. Flexible schedules</li> <li>iii. Compressed work weeks</li> </ul> </li> <li>n) Implement commute trip reduction marketing, such as:           <ul style="list-style-type: none"> <li>i. New employee orientation of trip</li> </ul> </li> </ul>	

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Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>reduction and alternative mode options</li> <li>ii. Event promotions</li> <li>iii. publications</li> <li>o) Implement preferential parking permit program</li> <li>p) Implement school pool and bus programs</li> <li>q) Price workplace parking, such as:               <ul style="list-style-type: none"> <li>i. Explicitly charging for parking for its employees;</li> <li>ii. Implementing above market rate pricing;</li> <li>iii. Validating parking only for invited guests;</li> <li>iv. Not providing employee parking and transportation allowances; and</li> <li>v. Educating employers about available alternatives.</li> </ul> </li> </ul>	
<p><u>Hazards and Hazardous Materials</u> <i>Significant Hazard due to Routine Transport, Use, or Disposal of Hazardous Materials / Reasonably Foreseeable Upset and Accident Conditions, Hazardous Emissions or Materials Near School</i></p>	<p><b>Project-Level Mitigation Measure</b> <b>MM-HAZ-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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:               <ul style="list-style-type: none"> <li>o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</li> <li>o The location of such hazardous materials.</li> </ul> </li> </ul>	<p><b>The Project already substantially complies with this Mitigation Measure through compliance with regulatory compliance measures.</b> The City imposes the following regulatory compliance measures regarding methane mitigation, which is consistent with the RTP/SCS PEIR Mitigation Measures as they are capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies:</p> <p><b>RCM-HAZ-1 Asbestos.</b> Due to the age of the building(s) being demolished, toxic and/or hazardous construction materials may be located in the structure(s). Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.</p> <p><b>RCM-HAZ-2 Methane Mitigation System.</b> The Proposed Project shall provide a methane mitigation system as required by Table 71 in Section 2. Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code based on the</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>o An emergency response plan including employee training information.</li> <li>o A plan that describes the way these materials are handled, transported and disposed.</li> <li>d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</li> <li>e) Avoid overtopping construction equipment fuel gas tanks.</li> <li>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</li> <li>g) Properly dispose of discarded containers of fuels and other chemicals.</li> <li>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</li> <li>i) Identify and implement more stringent tank car safety standards.</li> <li>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</li> <li>k) Use best available inspection equipment and protocols and implement positive train control.</li> <li>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</li> <li>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</li> <li>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.</li> <li>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.</li> <li>p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.</li> <li>q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.</li> </ul>	<p>Site Design Level I.</p> <p>In addition, a Phase I Environmental Site Assessment (ESA) and Phase II ESA were conducted at the Project Site to determine the presence or likelihood of hazardous substances on the property (see Appendices G.1 and G.4 of this SCEA). The Phase I ESA concluded that there was potential for hazardous materials to impact the property subsurface due to former auto repair operations at the Project Site. Therefore, a Phase II ESA was conducted to evaluate whether the former auto repair operation had significantly impacted the subsurface of the Project Site. No volatile organic compounds (VOCs) were detected in any soil vapor samples taken and analyzed. As such, the Phase II ESA concluded that there was no threat to human health or the environment, and no further assessment of Project Site features was necessary.</p>
<p><u>Hazards and Hazardous Materials</u> <i>Accidental release of hazardous materials</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>PMM HAZ-2:</b> 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:</p> <ul style="list-style-type: none"> <li>a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;</li> </ul>	<p><b>The Project already substantially complies with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to various regulatory compliance measures, that are capable of reducing hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials. Such features and measures include the following: <b>RCM-HAZ-1 Asbestos.</b> Due to the age of the building(s) being demolished, toxic and/or hazardous construction materials may be</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<ul style="list-style-type: none"> <li>b) More stringent tank car safety standards;</li> <li>c) Improved rail transportation route analysis, and modification of routes based on that analysis;</li> <li>d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;</li> <li>e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;</li> <li>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;</li> <li>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;</li> <li>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.</li> </ul>	<p>located in the structure(s). Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the Applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.</p> <p><b>RCM-HAZ-2 Methane Mitigation System.</b> The Proposed Project shall provide a methane mitigation system as required by Table 71 in Section 2. Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code based on the Site Design Level I.</p> <p>In addition, a Phase I Environmental Site Assessment (ESA) and Phase II ESA were conducted at the Project Site to determine the presence or likelihood of hazardous substances on the property (see Appendices G.1 and G.4 of this SCEA). The Phase I ESA concluded that there was potential for hazardous materials to impact the property subsurface due to former auto repair operations at the Project Site. Therefore, a Phase II ESA was conducted to evaluate whether the former auto repair operation had significantly impacted the subsurface of the Project Site. No volatile organic compounds (VOCs) were detected in any soil vapor samples taken and analyzed. As such, the Phase II ESA concluded that there was no threat to human health or the environment, and no further assessment of Project Site features was necessary.</p>
<p><u>Hazards and Hazardous Materials Release of hazardous materials near schools</u></p>	<p><b>Project-Level Mitigation Measure</b>  <b>PMM HAZ-3:</b> 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</p>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in Section 6.0 of this SCEA, that the Project would not result in a potentially significant impact related to release of hazardous materials near schools.</p>



**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
	<p>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.</p>	
<p><u>Hazards and Hazardous Materials Located on a Hazardous Materials Site Section 65962.5</u></p>	<p><b>Project-Level Mitigation Measure</b>  <b>MM-HAZ-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and</li> </ul>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure through compliance with regulatory compliance measures.</b> The Proposed Project would include the regulatory compliance measures RCM-HAZ-1 and RCM-HAZ-2 (referenced above), as a condition of approval, which is consistent with the RTP/SCS PEIR mitigation measures as it is capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies.</p> <p>In addition, a Phase I ESA and Phase II ESA were conducted at the Project Site to determine the presence or likelihood of hazardous substances on the property (see Appendices G.1 and G.4 of this SCEA). The Phase I ESA concluded that there was potential for hazardous materials to impact the property subsurface due to former auto repair operations at the Project Site. Therefore, a Phase II ESA was conducted to evaluate whether the former auto repair operation had significantly impacted the subsurface of the Project Site. No VOCs were detected in any soil vapor samples taken and analyzed. As such, the Phase II ESA concluded that there was no threat to human health or the environment, and no further assessment of Project Site features was necessary.</p>

**Table 4.1  
 Applicability of Project-Level Mitigation Measures from  
 Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>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.</p> <p>g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</p> <p>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 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <p>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.</p> <p>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.</p>	
<p><u>Hazards and Hazardous Materials</u> <i>Impair Implementation of, Physically Interfere with, Adopted Emergency Response or Emergency Evacuation Plan</i></p>	<p><u>Project-Level Mitigation Measures</u> See <b>MM-HAZ-1</b> through <b>MM-HAZ-4</b> and <b>MM-TRA-5</b>.</p> <p><b>MM-HAZ-5:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.</li> <li>b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;</li> <li>c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.</li> </ul>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> The Project Site is not located along a designated disaster route or an adopted emergency response or evacuation plan by the City or the County. Therefore, none of the Mitigation Measures that pertain to emergency response plans or evacuation plans are applicable to the Proposed Project.</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<p>Hydrology and Water Quality Violate Water Quality Standards or Waste Discharge Requirements / Alteration of Site Drainage Pattern That Would Increase Erosion or Siltation / Alteration of Site Drainage That Would Increase Flooding / Runoff Exceeding Stormwater Drainage System Capacity</p> <p>Wildfire Expose People, Structures to Downslope, Downstream Flooding, Landslides Resulting from Runoff, Post-Fire Slope Stability, or Drainage Changes</p> <p>Utilities and Service Systems – Wastewater Require Relocation, New Wastewater Treatment or Storm Drainage Facilities, Construction of Which Could Cause Significant Environmental Effect</p>	<p><b>Project-Level Mitigation Measure</b>  <b>MM-HYD-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</p> <p>b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</p> <p>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.</p> <p>d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.</p> <p>e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</p> <p>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:</p> <p>g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p><b>The Proposed Project already substantially complies with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following standard regulatory compliance measures, which are capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies:</p> <p><b>RCM-HYD-1 National Pollutant Discharge Elimination System General Permit.</b> Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.</p> <p><b>RCM-HYD-2 Stormwater Pollution (Demolition, Grading, and Construction Activities).</b> Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.</p> <ul style="list-style-type: none"> <li>o Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.</li> <li>o All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.</li> <li>o Pavement shall not be hosed down at</li> </ul>

**Table 4.1  
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Topic	Measure	Applicability to the Project
	<p>design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.</p> <p>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.</p> <p>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.</p>	<p>material spills. Dry cleanup methods shall be used whenever possible.</p> <ul style="list-style-type: none"> <li>o Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.</li> </ul> <p><b>RCM-HYD-3 Standard Urban Stormwater Mitigation Plan.</b> Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.</p>
<p><u>Hydrology and Water Quality</u> <i>Substantially Decrease Groundwater Supply or Interfere with Groundwater Recharge / Alteration of Site Drainage That Would Increase Flooding / Runoff Exceeding Stormwater Drainage System Capacity / Conflict with Water Quality Control Plan, Sustainable Groundwater Management Plan</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-HYD-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>a) Avoid designs that require continual dewatering when feasible.</p> <p>For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</p> <p>a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</p> <p>b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.</p> <p>c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p>	<p><b>The Proposed Project already substantially complies with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following standard regulatory practices, which are capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies:</p> <p><b>RCM-HYD-4 Low Impact Development Plan.</b> Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</p> <p><b>RCM-HAZ-5 Best Management Practices.</b> The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<p><u>Hydrology and Water Quality</u>  <i>In Flood Hazard, Tsunami, or Seiche Zone, Risk of Pollutant Release Due to Inundation</i></p>	<p><b>Project-Level Mitigation Measure</b>  <b>MM-HYD-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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.</p>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> The Project Site is not located within a designated flood zone, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map.</p>
<p><u>Land Use</u>  <i>Potential to Physically Divide Established Community</i></p>	<p><b>Project-Level Mitigation Measure</b>  <b>MM-LU-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation 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:</p> <p>a) Facilitate good design for land use projects that build upon and improve existing circulation patterns.</p> <p>b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:</p> <ul style="list-style-type: none"> <li>o Selecting alignments within or adjacent to existing public rights of way.</li> <li>o 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.</li> <li>o Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>o Alignment shifts to minimize the area affected.</li> <li>o Reduction of the proposed right-of-way take to minimize the overall area of impact.</li> <li>o Provisions for bicycle, pedestrian, and vehicle access across improved roadways.</li> </ul>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> For permanent impacts relating to physically dividing a community, this mitigation measure is not relevant as the Proposed Project does not physically divide a community as the Proposed Project does not propose a new right-of-way alignments or street vacation. The Proposed Project would replace four existing commercial/retail buildings and will provide all required street dedications and improvements.</p> <p>For any temporary impacts related to construction, the Proposed project would incorporate PDF TRAFFIC-2 Worksite Traffic Control Requirements, which is consistent with the RTP/SCS PEIR mitigation measures as they avoid or reduce the significant effects related to the physical division of an established community during construction:</p> <ul style="list-style-type: none"> <li>o <b>PDF-TRAFFIC-2 Worksite Traffic Control Requirements.</b> The Applicant shall prepare and submit a construction work site traffic control plan to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <a href="http://ladot.lacity.org/what-wedo/plan-review">http://ladot.lacity.org/what-wedo/plan-review</a> to determine which section to coordinate review of the work site traffic control plan. The plan shall identify the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and</li> </ul>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
		<p>access to abutting properties. All construction related truck traffic shall be restricted to off-peak hours to the extent feasible.</p>
<p><i>Land Use Conflict with Applicable Land Use Plan, Policy, or Regulation</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-LU-2:</b> 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 physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where 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.</p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Proposed Project would not physically divide a community. The Proposed Project is consistent with the General Plan and underlying zone designation and is not seeking a General Plan amendment or zone change.</p>
<p><i>Mineral Resources Loss of Availability of a Known Mineral Resource / Loss of Mineral Resource Recovery Site Delineated on Local General Plan, Specific Plan, Other Land Use Plan</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-MIN-1:</b> 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:</p> <p>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.</p> <p>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 city general plans, or other comparable measures such as:</p> <ol style="list-style-type: none"> <li>1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.</li> <li>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.</li> <li>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</li> </ol>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> A significant impact to mineral resources may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if the project development would convert an existing or future regionally important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally important mineral resource extraction.</p> <p>The Project Site is zoned C2-4D-O. The Project Site is located within a Mineral Resources Zone 2 (MRZ-2). However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with four commercial/retail buildings and a paved surface parking lot. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource.</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	<p>and during long-term operations.</p> <p>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.</p>	
<p><u>Noise</u> <i>Substantial Temporary or Permanent Increase in Ambient Noise Levels In Excess of Standards Established in Local General Plan or Noise Ordinance / Generation of Excessive Groundborne Vibration or Groundborne Noise Levels / For Project Located in Vicinity of Private Airstrip, Airport Land Use Plan, or Within Two Miles of Public Airport, Expose People to Excessive Noise Levels</i></p> <p><u>Hazards and Hazardous Materials</u> <i>For Project Located in Vicinity of Private Airstrip, Airport Land Use Plan, or Within Two Miles of Public Airport, Expose People to Excessive Noise Levels</i></p> <p><u>Recreation</u> <i>Adverse Impacts Associated With</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-NOISE-1(b):</b> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor’s Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. 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., mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating</p>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures and implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure.</b> It is subject to the following regulatory compliance measures that avoid or reduce the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies:</p> <p><b>RCM-N-1.</b> The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.</p> <p><b>RCM-N-2.</b> The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner’s agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.</p> <p>Additionally, the City imposes the following Mitigation Measures, which are consistent with the RTP/SCS PEIR mitigation measures as they will avoid or reduce the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies:</p> <ul style="list-style-type: none"> <li>• <b>Increased Noise Levels (Demolition, Grading, and Construction Activities)</b></li> </ul>



**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
<p><i>New Or Physically Altered Park Facilities, Construction of Which Could Cause Significant Environmental Impacts / Include Recreational Facilities, Require Construction or Expansion Which Might Have Adverse Effect</i></p>	<p>shields of shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</p> <p>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 can and 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.</p> <p>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.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt of “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</p> <p>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.</p> <p>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;</p> <p>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.</p> <p>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> <p>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</p>	<p><b>MM-N-1</b> Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.</p> <p><b>MM-N-2</b> Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p><b>MM-N-3</b> The project contractor shall use power construction equipment with noise shielding and muffling devices.</p> <p><b>MM-N-4</b> The project contractor shall erect a minimum 8-foot high temporary noise-attenuating sound barrier along the perimeter of the Project Site during construction. The sound barrier along the 12<sup>th</sup> Street frontage shall be designed to provide a minimum sound attenuation of -18 dBA at Sensitive Receptor #1 (the Axis Apartments Mixed-Use Building located at 1201 S. Main Street) and a minimum of 2.1 dBA at Sensitive Receptor #2 (the Proper Hotel located at 1100 S. Broadway).</p> <p><b>MM-N-5</b> During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
	<p>appropriate government agency) to provide equivalent noise reduction.</p> <p>q) Use of portable barriers in the vicinity of sensitive receptors during construction.</p> <p>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.</p> <p>s) Monitor the effectiveness of noise reduction measures by taking noise measurements.</p> <p>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.</p> <p>u) Construct sound-reducing barriers between noise sources and noise-sensitive land uses.</p> <p>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.</p> <p>w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</p> <p>x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p> <p>y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	
<p><u>Noise Generation of Excessive Groundborne Vibration or Groundborne Noise Levels</u></p>	<p><u>Project-Level Mitigation Measure</u> See <b>MM-NOISE-1</b>.</p> <p><b>MM-NOISE-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating noise/vibration standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>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.</p> <p>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</p>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through implementation of project-specific Mitigation Measures which are equal to or more effective than this Mitigation Measure.</b></p> <p>The nearest buildings are located across the adjacent alleyway, approximately 12 feet west of the Project Site. As shown in Table 6.24, below, the estimated vibration level at the nearest buildings located 12 feet from the Project Site is 0.17 PPV in/sec, which is well below the threshold of 0.3 PPV in/sec. With respect to a), b), and c) construction activities would not involve pile driving or blasting. With regard to d) the Proposed Project would conform to the allowable hours of construction as per the LAMC. With regard to item e), compliance with SCAQMD rules limit the idling of construction</p>

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Topic	Measure	Applicability to the Project
	<p>adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.</p> <p>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.</p> <p>d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.</p> <p>e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).</p> <p>f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.</p>	<p>equipment, which would also serve to reduce construction noise levels.</p> <p>The Proposed Project would implement the following Mitigation Measures, which are consistent with the RTP/SCS PEIR mitigation measure as they avoid or reduce the significant effects of noise/vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies:</p> <ul style="list-style-type: none"> <li>• <b>Increased Noise Levels (Demolition, Grading, and Construction Activities)</b></li> </ul> <p><b>MM-N-1</b> Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.</p> <p><b>MM-N-2</b> Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.</p> <p><b>MM-N-3</b> The project contractor shall use power construction equipment with noise shielding and muffling devices.</p> <p><b>MM-N-4</b> The project contractor shall erect a minimum 8-foot high temporary noise-attenuating sound barrier along the perimeter of the Project Site during construction. The sound barrier along the 12<sup>th</sup> Street frontage shall be designed to provide a minimum sound attenuation of -18 dBA at Sensitive Receptor #1 (the Axis Apartments Mixed-Use Building located at 1201 S. Main Street) and a minimum of 1.2 dBA at Sensitive Receptor #2 (the Proper Hotel located at 1100 S. Broadway).</p> <p><b>MM-N-5</b> During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.</p>
<p>Population and Housing Displacement of</p>	<p>Project-Level Implementation Measures <b>MM-POP-1.</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA</i></p>	<p><b>This Mitigation Measure is not relevant to the Proposed Project.</b> The Proposed Project would</p>

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Topic	Measure	Applicability to the Project
<p><i>People or Housing, Requiring Replacement Housing Elsewhere</i></p>	<p><i>Guidelines</i>, 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:</p> <ol style="list-style-type: none"> <li>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.</li> <li>Prioritize the use existing ROWs, wherever feasible.</li> <li>Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.</li> <li>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).</li> <li>When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.</li> </ol>	<p>consist of the development of new housing and commercial land uses on a site that is currently occupied by four commercial/retail buildings and a paved surface parking lot. No displacement of existing housing would occur with the development of the Proposed Project, and therefore, none of the suggested measures are applicable.</p>
<p><u>Public Services – Fire</u> <i>Adverse Impacts Associated with New or Physically Altered Fire Protection Facilities Construction of Which Could Cause Significant Environmental Impacts</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-PSP-1:</b> 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:</p> <ul style="list-style-type: none"> <li>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 required additional construction of buildings is incorporated into the project description.</li> <li>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.</li> <li>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</li> </ul>	<p><b>The Proposed Project substantially conforms to this Mitigation Measure through compliance with regulatory compliance measures.</b> As discussed in Section 6.XV (Public Services), existing facilities are capable of providing acceptable response times for fire protection and emergency response services. The Project Site and surrounding area are served by the Los Angeles Fire Department (LAFD). Specifically, the LAFD considers fire protection services for a project adequate if a project is within the maximum response distance (1.5 miles in this instance). The Project Site is served by LAFD Station No. 10, approximately 0.7 miles southwest of the Project Site. Therefore, fire protection response with existing facilities is therefore considered adequate, and Project impacts would not be significant.</p> <p>Additionally, the City has determined that the following regulatory compliance measure is equal to or more effective than this Mitigation Measure with respect to avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions:</p>

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Topic	Measure	Applicability to the Project
	<p>be given equal consideration when developing a traffic control plan.</p>	<p><b>RCM-PS-1 Public Services (LAFD).</b> The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:</p> <ul style="list-style-type: none"> <li>○ Fire lanes, where required, shall be a minimum of 20 feet in width;</li> <li>○ All structures must be within 300 feet of an approved fire hydrant; and</li> <li>○ Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.</li> <li>○ Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.</li> </ul>
<p><u>Public Services – Police</u> <i>Adverse Impacts Associated with New or Physically Altered Police Facilities, Construction of Which Could Cause Significant Environmental Impacts</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-PSP-1:</b> 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:</p> <ul style="list-style-type: none"> <li>• 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 required additional construction of buildings is incorporated into the project description.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p><b>The Proposed Project substantially conforms to this Mitigation Measure through implementation of project design features.</b> Existing facilities are capable of providing acceptable response times for police protection. The Project Site is currently served by the City of Los Angeles Police Department’s (LAPD) Central Bureau, which oversees LAPD operations in the Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The Central Community Police Station, located at 251 East 6<sup>th</sup> Street, approximately 0.9 mile northeast (driving distance) from the Project Site.</p> <p><i>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 and police protection, and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public safety services are provided. Furthermore, as the court concluded, the need for additional</i></p>

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Topic	Measure	Applicability to the Project
	<p>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.</p>	<p>public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.</p> <p>Additionally, the Proposed Project would implement the following project design features, which are consistent with the RTP/SCS PEIR Mitigation Measure as they avoid or reduce the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions:</p> <p><b>PDF-PS-1 Public Services (Police – Demolition / Construction Sites).</b> Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.</p> <p><b>PDF-PS-2 Public Services (Police – Operation).</b> The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to surveillance cameras, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed.</p> <p>Additionally, the Applicant will prepare a construction work site traffic control plan to address construction-related traffic impacts as required through PDF-TRAFFIC-2, below:</p> <p><b>PDF-TRAFFIC-2 Worksite Traffic Control Requirements.</b> The Applicant will prepare and submit a construction work site traffic control plan to DOT’s Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <a href="http://ladot.lacity.org/what-wedo/plan-review">http://ladot.lacity.org/what-wedo/plan-review</a> to determine which section to coordinate review of the work site traffic control plan. The plan shall identify the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related truck traffic be restricted to off-peak hours to the</p>

**Table 4.1  
Applicability of Project-Level Mitigation Measures from  
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Topic	Measure	Applicability to the Project
<p><u>Public Services – Schools</u> <i>Adverse Impacts Associated with New or Physically Altered Educational Facilities, Construction of Which Could Cause Significant Environmental Impacts</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-PSS-1:</b> 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:</p> <p>a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</p>	<p>extent feasible.</p> <p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following regulatory compliance measure that avoid or reduce the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions:</p> <p><b>RCM-PS-2 Public Services (Schools).</b> The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.</p>
<p><u>Public Services – Library</u> <i>Adverse Impacts Associated With New Or Physically Altered Library Facilities, Construction of Which Could Cause Significant Environmental Impacts</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-PSL-1:</b> 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:</p> <p>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.</p>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> As discussed in Section 6.XV (Public Services), there are no current plans to build new libraries that would serve the Project Site area. Therefore, the library branches serving the Project Site would be able to meet the Proposed Project’s demand for library services.</p>
<p><u>Parks and Recreation</u> <i>Increased Use of Existing Parks Such That Substantial Physical Deterioration of Recreational Facilities Would Occur / Adverse Impacts Associated With New Or Physically Altered Park Facilities, Construction of Which Could Cause Significant</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-REC-1:</b> 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:</p> <p>a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.</p> <p>b) Prior to the issuance of permits, where projects</p>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following regulatory compliance measure that avoids or reduces the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies:</p> <p><b>RCM-PS-3 Recreation (Increased Demand for Parks or Recreational Facilities).</b> Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units.</p>

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**Applicability of Project-Level Mitigation Measures from**  
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Topic	Measure	Applicability to the Project
<p><i>Environmental Impacts / Include Recreational Facilities, Require Construction or Expansion Which Might Have Adverse Effect</i></p>	<p>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:</p> <ol style="list-style-type: none"> <li>i. Increasing the accessibility to natural areas for outdoor recreation.</li> <li>ii. Utilizing “green” development techniques</li> <li>iii. Promoting water-efficient land use and development.</li> <li>iv. Encouraging multiple uses, such as the joint use of schools.</li> <li>v. Including trail systems and trail segments in General Plan recreation standards</li> </ol>	<p>Additionally, the Proposed Project already substantially complies with this Mitigation Measure because it would include 39,601 square feet of open space, per LAMC requirements. Recreational amenities would include a 5<sup>th</sup> level amenity deck and a roof deck. These areas provide the opportunity for Project residents, neighbors, and patrons of the retail space to gather.</p>
<p><u>Transportation, Traffic, and Safety Conflict Or Be Inconsistent With CEQA Guidelines Section 15064.3(b).</u></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-TRA-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Transportation demand management (TDM) strategies should be incorporated into individual 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: <i>Integrating Demand Management into the Transportation Planning Process: A Desk Reference</i> (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: <ul style="list-style-type: none"> <li>○ Include TDM mitigation requirements for new developments;</li> <li>○ Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;</li> <li>○ Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;</li> <li>○ Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;</li> <li>○ Develop TDM-specific performance measures to evaluate project-specific and system-wide performance;</li> <li>○ Incorporate TDM performance measures in the decision-making process for identifying transportation investments;</li> </ul> </li> </ul>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure.</b> Through project design, compliance with regulatory compliance measures, and implementation of Project Design Features, the Proposed Project would avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies:</p> <p><b>RCM-TRAFFIC-1: Parking Requirements.</b> In accordance with the LAMC, the project shall provide a total of 373 residential and commercial vehicle parking spaces 23 short-term bicycle parking spaces and 172 long-term bicycle parking spaces on-site.</p> <p><b>RCM-TRAFFIC-2: Highway Dedication and Street Widening Requirements.</b> Per the Mobility Element of the General Plan, Main Street, Modified Avenue I, would require a 34-foot half-width roadway within a 50-foot half-width right-of-way; 12th Street, a Modified Collector Street, would require a 20-foot half-width roadway within a 32-foot half-width right-of-way; and the adjacent alley would require a 10-foot half-width right-of-way. The applicant shall provide the required street dedication and improvements in accordance with Case No. VTT-82463.</p> <p><b>RCM-TRAFFIC-3 Development Review Fees.</b> Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.</p> <p>Additionally, the Proposed Project incorporates the following Project Design Features that are</p>



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	<ul style="list-style-type: none"> <li>○ Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and</li> <li>○ Set aside funding for TDM initiatives.</li> <li>○ 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.</li> </ul>	<p>consistent with the SCAG EIR mitigation measures as they avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies:</p> <p><b>PDF-TRAFFIC-1 Project Access and Circulation.</b> In order to minimize and prevent last minute building design changes, the Applicant shall contact DOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design.</p> <p><b>PDF-TRAFFIC-2 Worksite Traffic Control Requirements.</b> The Applicant will prepare and submit a construction work site traffic control plan to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <a href="http://ladot.lacity.org/what-wedo/plan-review">http://ladot.lacity.org/what-wedo/plan-review</a> to determine which section to coordinate review of the work site traffic control plan. The plan shall identify the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related truck traffic be restricted to off-peak hours to the extent feasible.</p> <p><b>PDF-TRAFFIC-3 Pedestrian Safety.</b> The Proposed Project shall include the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.</p> <ul style="list-style-type: none"> <li>○ Improve sidewalks adjacent to and within the Project.</li> <li>○ Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian- scale lighting, etc., along Main Street and 12<sup>th</sup> Street.</li> <li>○ Provide pedestrian-scale retail commercial uses along street frontages.</li> <li>○ Provide an on-site transit information kiosk.</li> <li>○ Provide on-site concierge service to facilitate use of transit, taxis, shuttles, and transportation network companies.</li> </ul>

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Topic	Measure	Applicability to the Project
<p><u>Transportation, Traffic, and Safety</u> <i>Result in Inadequate Emergency Access/ Impair or Interfere with Emergency Response or Evacuation Plan</i></p>	<p><u>Project-Level Mitigation Measure</u> <b>MM-TRA-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>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:</p> <ul style="list-style-type: none"> <li>o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.</li> <li>o 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.</li> <li>o Scheduling of truck trips outside of peak morning and evening commute hours.</li> <li>o Limiting of lane closures during peak hours to the extent possible.</li> <li>o Usage of haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>o Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.</li> <li>o Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.</li> <li>o 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,</li> </ul>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure.</b> The Proposed Project would incorporate Project Design Feature <b>PDF-TRAFFIC-1</b> (see above), which is consistent with the RTP/SCS PEIR mitigation measures as they avoid or reduce impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies.</p>

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	<p>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.</p> <ul style="list-style-type: none"> <li>○ Storage of construction materials only in designated areas.</li> <li>○ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</li> <li>○ 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.</li> <li>○ Enhance emergency preparedness awareness among public agencies and with the public at large.</li> </ul>	
<p><u>Tribal Cultural Resources</u> <i>Cause Substantial Adverse Change in Significance of Tribal Cultural Resource</i></p>	<p><u>Project-Level Mitigation Measure</u> See <b>MM-CULT-1</b>.</p> <p><b>MM-TCR-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>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</li> <li>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;</li> <li>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.</li> </ul>	<p><b>The Proposed Project would substantially conform to this Mitigation Measure through compliance with regulatory compliance measures.</b> No archaeological resources were identified within the Project Site or immediate vicinity as a result the CHRIS records search or through the NAHC SLF search (see Appendices C.2 and K of this SCEA). Based on the findings of these technical reports, no known historic, archaeological or tribal cultural resources occur on site. Accordingly, the City has determined that the following regulatory compliance measure is equal to or more effective than this Mitigation Measure in avoiding potential impacts to inadvertent finds of historic, archeological, or tribal cultural resources:</p> <p><b>RCM-CR-1 Archaeological.</b> In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological</p>

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<p><u>Utilities and Service Systems – Solid Waste Generate Solid Waste in Excess of State or Local Standards, or in Excess of Local Infrastructure, Impair Solid Waste Reduction Goals / Comply with Federal, State, Local Management and Reduction Statutes and Regulations</u></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-USSW-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>a) Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>b) Inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>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.).</li> <li>d) Reuse of existing structure and shell in renovation projects.</li> <li>e) Development of indoor recycling program and space.</li> <li>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 buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</li> <li>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.</li> <li>h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.</li> <li>i) Encourage the development of local markets for</li> </ul>	<p>treatment plan, testing, or data recovery may be warranted.</p> <p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following regulatory compliance measures that avoid or reduce the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and reduced<sup>1</sup> that are within the responsibility of public agencies and/or Lead Agencies:</p> <p><b>RCM-PU-5 Solid Waste Recycling – Construction/Demolition.</b> In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:</p> <ul style="list-style-type: none"> <li>o Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.</li> <li>o To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.</li> </ul> <p><b>RCM-PU-6 Solid Waste Recycling – Operational.</b> In compliance with LAMC Section 66.32 and AB 341, the Proposed Project shall incorporate the following:</p> <ul style="list-style-type: none"> <li>o All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-</li> </ul>

<sup>1</sup> AB 341 website: [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201120120AB341](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341), accessed June 2021.

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	<p>waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.</p> <p>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.</p> <p>k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</p> <p>l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.</p> <p>m) Provide education and publicity about reducing waste and available recycling services.</p> <p>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.</p>	<p>based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.</p> <ul style="list-style-type: none"> <li>o Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.</li> </ul>
<p><u>Utilities and Service Systems – Wastewater</u> <i>Require Relocation, New Wastewater Treatment or Storm Drainage Facilities, Construction of Which Could Cause Significant Environmental Effect / Result in Determination By Wastewater Treatment Provider That it Has Adequate Capacity to Serve Project</i></p>	<p><u>Project-Level Mitigation Measure</u> See <b>MM-HYD-1</b>.</p> <p><b>MM-USWW-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measures.</b> It is subject to the following regulatory programs that avoid or reduce the significant effects on utilities and service systems:</p> <p><b>RCM-PU-1 Water Connection.</b> As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.</p> <p><b>RCM-PU-2 Low Impact Development Plan.</b> Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</p> <p><b>RCM-PU-3 Water.</b> The Proposed Project shall</p>

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Topic	Measure	Applicability to the Project
		<p>comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p><b>RCM-PU-4 Water.</b> The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to 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 in accordance with the California Building Energy Efficiency Standards by 20%. 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.</p>
<p><u>Utilities and Service Systems – Water Supply</u>  <i>Require Relocation, New or Expanded Water Facilities, Construction of Which Could Cause Significant Environmental Effects / Have Sufficient Water Supplies to Serve Project and Future Development</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-USWS-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</li> <li>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</li> </ul>	<p><b>The Proposed Project already substantially conforms with this Mitigation Measure through compliance with regulatory compliance measure.</b> The Proposed Project is subject to the following regulatory compliance measures that avoid or reduce the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies:</p> <p><b>RCM-PU-3 Water.</b> The Proposed Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p><b>RCM-PU-4 Water.</b> The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
	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.	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 in accordance with the California Building Energy Efficiency Standards by 20%. 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.
<p><u>Wildfire</u>  <i>Exacerbate Wildfire Risks, Expose Project Occupants to Pollutant Concentrations from Wildfire</i></p>	<p><u>Project-Level Mitigation Measure</u>  <b>MM-WF-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.</li> <li>d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.</li> <li>e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.</li> <li>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.</li> <li>g) Include external sprinklers with an independent water source to reduce flammability of structures.</li> <li>h) Include local solar power paired with batteries to reduce power flow in electricity lines.</li> <li>i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.</li> <li>j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.</li> <li>k) Developments in fire-prone areas should have fire-resistant feature, such as: <ul style="list-style-type: none"> <li>- Ember-resistant vents</li> <li>- Fire-resistant roofs</li> <li>- Surrounding defensible space</li> <li>- Proper maintenance and upkeep of structures and surrounding area</li> </ul> </li> </ul>	<p><b>This Mitigation Measure is not applicable to the Proposed Project</b> as the Project Site is not located within State-designated Very High Fire Hazard Severity Zones. The Project Site, as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot and is located in a highly urbanized area of the City.</p>

**Table 4.1**  
**Applicability of Project-Level Mitigation Measures from**  
**Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**

Topic	Measure	Applicability to the Project
<p>Wildfire  <i>Require Installation or Maintenance of Associated Infrastructure that May Exacerbate Fire Risks, May Result in Temporary or Ongoing Impacts to Environment / Expose People, Structures to Downslope, Downstream Flooding, Landslides Resulting from Runoff, Post-Fire Slope Stability, or Drainage Chang</i></p>	<p>Project-Level Mitigation Measure            See <b>MM-HAZ-4</b>.</p> <p><b>MM-WF-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, 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:</p> <p>a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to</p> <ul style="list-style-type: none"> <li>• Submit a fire protection plan including the designation of fire watch staff;</li> <li>• Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;</li> <li>• Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and</li> <li>• Designate trained fire watch staff during project construction to reduce risk of fire hazards.</li> </ul>	<p><b>This Mitigation Measure is not applicable to the Proposed Project.</b> The Project Site is not located within State-designated Very High Fire Hazard Severity Zones. The Project Site, as it currently exists, is fully developed with four commercial/retail buildings and a surface parking lot and is located in a highly urbanized area of the City.</p>

Source: Southern California Association of Governments, Exhibit A: Mitigation Monitoring and Reporting Program for the Final Connect SoCal PEIR, adopted May 2020.



## Section 5. SCEA Initial Study Checklist

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**Project Title:** Main Street Tower Project

**Environmental Case Number:** ENV-2018-7379-SCEA

**Related Cases:** ZA-2018-7378-ZV-TDR-SPR

**Project Location:** 1123-1161 S. Main Street and 111 W. 12<sup>th</sup> Street, Los Angeles, CA 90015

**Community Plan Area:** Central City

**Council District:** 14 – Kevin de León

**Lead City Agency:** City of Los Angeles, Department of City Planning

**Staff Contact Name and Address:** Nuri Cho  
200 N. Main Street, Room 620  
Los Angeles CA 90012  
**Phone Number:** (213) 978-1177

**Applicant Name and Address:** Frontier Holdings West, LLC  
888 S. Figueroa Street, Suite 1900  
Los Angeles, CA 90017  
**Phone Number:** (213) 745-5191

**General Plan Designation:** Regional Center Commercial

**Zoning:** C2-4D-O

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**PROJECT DESCRIPTION:** The Proposed Project would result in the demolition of four existing commercial/retail buildings (a total of approximately 28,110 square feet of floor area) and surface parking lot and the new construction, use, and maintenance of a 30-story (340 feet above grade) mixed-use building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail uses. The Proposed Project would include a four-story above grade parking podium with an amenity deck and a 26-story residential tower above the amenity deck. The Proposed Project would provide a total of 373 vehicle parking spaces and 195 bicycle parking spaces in accordance with the Los Angeles Municipal Code (“LAMC”) requirements. Primary vehicular access for residential and commercial uses would be provided from Main Street and from the adjacent alley. The Proposed Project would provide approximately 39,601 square feet of open space pursuant to the LAMC requirements. In total, the Proposed Project would include 343,447 square feet of total floor area resulting in a floor area ratio (FAR) of 7.03:1. The Proposed Project would remove nine (9) existing

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non-protected street trees in the right-of-way surrounding the Project Site: eight (8) trees along Main Street and one (1) tree along 12th Street. The Proposed Project would require approximately 5,434 cubic yards of soil to be exported from the Project Site and approximately 5,434 cubic yards of soil import.

The Project's discretionary requests include: (1) Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82463 to create one master ground lot for a mixed-use project containing 363 residential units and for the export of approximately 5,434 cubic yards of soil; (2) Pursuant to LAMC Section 12.27, a Zone Variance to permit 100 percent of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard spaces; (3) Pursuant to LAMC Section 14.5.7, a Transfer of Floor Area Rights (TFAR) for a transfer of 49,999 square feet of floor area to allow a total floor area of 343,447 square feet with a Floor Area Ratio (FAR) of 7.03:1; and (4) Pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates, or results in an increase of 50 or more dwelling units. The Proposed Project would also require approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements.

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**ENVIRONMENTAL SETTING:** The Project Site includes eight parcels (Assessor Parcel No. 5139-017-015, 5139-017-016, 5139-017-017, 5139-017-018, and 5139-017-029) that encompasses 48,908 square feet of lot area (1.12 acres). The Project Site is currently occupied by four single-story commercial/retail buildings and a paved surface parking lot. The surrounding properties are developed with commercial/retail, office, light industrial, and mixed-use properties. (For additional detail, see "Section 3. Project Description").

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**Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):** N/A

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**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Hazards & Hazardous Materials	<input type="checkbox"/> Recreation
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Transportation
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Tribal ghg
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Utilities / Service Systems
<input type="checkbox"/> Energy	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Wildfire
<input type="checkbox"/> Geology / Soils	<input type="checkbox"/> Population / Housing	<input checked="" type="checkbox"/> Mandatory Findings of Significance

**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.

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- 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.

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

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- 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.

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- 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.

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- 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) Initial Study identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

Debbie Lawrence  
PRINTED NAME

Senior City Planner  
TITLE

*Debbie Lawrence*  
SIGNATURE

September 30, 2021  
DATE

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## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
<b>I. AESTHETICS</b>					
a.	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>II. AGRICULTURE AND FOREST RESOURCES</b>					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	51104(g)?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>III. AIR QUALITY</b>					
a.	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IV. BIOLOGICAL RESOURCES</b>					
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 Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Have a substantial adverse effect on state	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>V. CULTURAL RESOURCES</b>					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VI. ENERGY</b>					
a.	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b>					
a.i.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a.ii.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a.iii.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a.iv.	Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Directly or indirectly destroy a unique	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	paleontological resource or site or unique geologic feature?				
<b>VIII. GREENHOUSE GAS EMISSIONS</b>					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IX. HAZARDS AND HAZARDOUS MATERIALS</b>					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	plan?				
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>X. HYDROLOGY AND WATER QUALITY</b>					
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.i	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: Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.ii	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: Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.iii	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: 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.iv	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: Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XI. LAND USE AND PLANNING</b>					
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XII. MINERAL RESOURCES</b>					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIII. NOISE</b>					
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	For a project located within the vicinity of a private airstrip or an airport land use plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
<b>XIV. POPULATION AND HOUSING</b>					
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XV. PUBLIC SERVICES</b>					
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVI. RECREATION</b>					
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVII. TRANSPORTATION</b>					
a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>					
	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a.	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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	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.				
<b>XIX. UTILITIES AND SERVICE SYSTEMS</b>					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XX. WILDFIRE</b>					
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## SUMMARY OF MITIGATION MEASURES, REGULATORY COMPLIANCE MEASURES, AND PROJECT DESIGN FEATURES

### I. AESTHETICS

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

##### **RCM-AES-1 Signage on Construction Barriers**

- Pursuant to LAMC Section 14.4.17 requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 24 hours of occurrence.

#### Project Design Features

##### **PDF-AES-1 Construction Barrier**

- The Project shall install temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. The Applicant shall ensure through daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of unauthorized signs, trash, graffiti, etc.) throughout the duration of construction.

### II. AGRICULTURE AND FORESTRY RESOURCES

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.



### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

### Project Design Features

No project design features are identified for the Proposed Project.

## **III. AIR QUALITY**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

#### **RCM-AQ-1 Site Clearing, Grading and Construction Activities**

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
  - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity shall not idle but be turned off.

**RCM-AQ-2** The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading,

handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

- RCM-AQ-3** The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).
- RCM-AQ-4** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- RCM-AQ-5** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- RCM-AQ-6** The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- RCM-AQ-7** The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.
- RCM-AQ-8** The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.
- RCM-AQ-9** New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **IV. BIOLOGICAL RESOURCES**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

**RCM-BIO-1 Tree Removal (Public Right-of-Way).** Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. The number, type and size of replacement trees to be provided in the public right-of-way shall be provided per the current Urban Forestry Division standards and to the satisfaction of the Department of Public Works.

**RCM-BIO-2 Habitat Modification (Nesting Native Birds).** Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record

shall be submitted and received into the case file for the associated discretionary action permitting the project.

### Project Design Features

No project design features are identified for the Proposed Project.

## **V. CULTURAL RESOURCES**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-CR-1 Archaeological.** In the event that cultural resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring in the vicinity of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted.

**RCM-CR-2 (Human Remains).** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:  
1104 N. Mission Road  
Los Angeles, CA 90033  
(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or  
(323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC

#### Project Design Features

No project design features are identified for the Proposed Project.

### **VI. ENERGY**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project

#### Project Design Features

No project design features are identified for the Proposed Project.

### **VII. GEOLOGY AND SOILS**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

**RCM-GEO-1 Geology (Erosion/Grading/Short-Term Construction Impacts).** The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

**RCM-GEO-2 Geology (Erosion/Grading/Short-Term Construction Impacts).** Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices ("BMPs") during grading and excavation to reduce erosion, including, but not limited to the following:

- Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season

(October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.

- Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

**RCM-GEO-3 Paleontological.** Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:

- The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

### Project Design Features

No project design features are identified for the Proposed Project.

## **VIII. GREENHOUSE GAS EMISSIONS**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-GHG-1** The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.

**RCM-GHG-2** The Project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. 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.

**RCM-GHG-3** As mandated by the LA Green Building Code, the Project is 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.

**RCM-GHG-4** The Project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485.

**RCM-GHG-5** Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

**RCM-GHG-6** The Project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage.

Indoor Water Use. Pursuant to Section 99.04.303.4 of the LAMC, a 20% reduction in the overall use of potable water within a building shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the Los Angeles Building Standards.

Outdoor Water Use. Pursuant to Section 99.04.304.1, a water budget shall be developed for landscape irrigation use that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Additionally, in new residential construction or building addition or alteration over 500 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the criteria specified in Section 99.04.304.2 and meet manufacturer's recommendations. Furthermore, outdoor water metering, swimming pool covers, and exterior faucets are regulated under the LAMC Section 99.04.304 for outdoor water usage.

### Project Design Features

No project design features are identified for the Proposed Project.

## IX. HAZARDS AND HAZARDOUS MATERIALS

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-HAZ-1 Asbestos.** Due to the age of the building(s) being demolished, toxic and/or hazardous construction materials may be located in the structure(s). Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

**RCM-HAZ-2 Methane Mitigation System.** The Proposed Project shall provide a methane mitigation system as required by Table 71 in Section 2. Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code based on the Site Design Level I.

### Project Design Features

No project design features are identified for the Proposed Project.

## X. HYDROLOGY AND WATER QUALITY

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-HYD-1 National Pollutant Discharge Elimination System General Permit.** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of



coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

**RCM-HYD-2 Stormwater Pollution (Demolition, Grading, and Construction Activities).**

Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

**RCM-HYD-3 Standard Urban Stormwater Mitigation Plan.** Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

**RCM-HYD-4 Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

**RCM-HYD-5 Best Management Practices.** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, which ever is greater, in accordance with the Development Best

Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **XI. LAND USE AND PLANNING**

#### Mitigation Measures

No mitigation measures are required.

#### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **XII. MINERAL RESOURCES**

#### Mitigation Measures

No mitigation measures are required.

#### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **XIII. NOISE**

#### Mitigation Measures

#### **Increased Noise Levels (Demolition, Grading, and Construction Activities)**

**MM-N-1** Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

- MM-N-2** Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- MM-N-3** The project contractor shall use power construction equipment with noise shielding and muffling devices.
- MM-N-4** The project contractor shall erect a minimum 8-foot high temporary noise-attenuating sound barrier along the perimeter of the Project Site during construction. The sound barrier along the 12<sup>th</sup> Street frontage shall be designed to provide a minimum sound attenuation of -18 dBA at Sensitive Receptor #1 (the Axis Apartments Mixed-Use Building located at 1201 S. Main Street) and a minimum of 2.1 dBA at Sensitive Receptor #2 (the Proper Hotel located at 1100 S. Broadway).
- MM-N-5** During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

#### Regulatory Compliance Measures

- RCM-N-1** The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- RCM-N-2** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **XIV. POPULATION AND HOUSING**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

### Project Design Features

No project design features are identified for the Proposed Project.

## **XV. PUBLIC SERVICES**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-PS-1 Public Services (LAFD).** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width;
- All structures must be within 300 feet of an approved fire hydrant; and
- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

**RCM-PS-2 Public Services (Schools).** The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area

**RCM-PS-3 Recreation (Increased Demand for Parks or Recreational Facilities).** Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units.

### Project Design Features

**PDF-PS-1 Public Services (Police – Demolition / Construction Sites).** Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

**PDF-PS-2 Public Services (Police – Operation).** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to: surveillance cameras, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed.

## **XVI. RECREATION**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

### Project Design Features

No project design features are identified for the Proposed Project.

## **XVII. TRANSPORTATION**

### Mitigation Measures

No mitigation measures are required for the Proposed Project.

### Regulatory Compliance Measures

**RCM-TRAFFIC-1: Parking Requirements.** In accordance with the LAMC, the project shall provide a total of 373 residential and commercial vehicle parking spaces 23 short-term bicycle parking spaces and 172 long-term bicycle parking spaces on-site.

**RCM-TRAFFIC-2: Highway Dedication and Street Widening Requirements.** Per the Mobility Element of the General Plan, Main Street, Modified Avenue I, would require a 34-foot half-width roadway within a 50-foot half-width right-of-way; 12<sup>th</sup> Street, a Modified Collector Street, would require a 20-foot half-width roadway within a 32-foot half-width right-of-way; and the adjacent alley would require a 10-foot half-width right-of-way. The applicant shall provide the required street dedication and improvements in accordance with Case No. VTT-82463.

**RCM-TRAFFIC-3 Development Review Fees.** Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

#### Project Design Features

**PDF-TRAFFIC-1 Project Access and Circulation.** In order to minimize and prevent last minute building design changes, the applicant shall contact DOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design.

**PDF-TRAFFIC-2 Worksite Traffic Control Requirements.** The Applicant shall prepare and submit a construction work site traffic control plan to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/what-wedo/plan-review> to determine which section to coordinate review of the work site traffic control plan. The plan shall identify the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related truck traffic be restricted to off-peak hours to the extent feasible.

**PDF-TRAFFIC-3 Pedestrian Safety.** The Proposed Project shall include the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.

- Improve sidewalks adjacent to and within the Project.
- Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian- scale lighting, etc., along Main Street and 12<sup>th</sup> Street.
- Provide pedestrian-scale retail commercial uses along street frontages.
- Provide an on-site transit information kiosk.
- Provide on-site concierge service to facilitate use of transit, taxis, shuttles, and transportation network companies.

## **XVIII. TRIBAL CULTURAL RESOURCES**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

#### Project Design Features

No project design features are identified for the Proposed Project.

### **XIX. UTILITIES AND SERVICE SYSTEMS**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

**RCM-PU-1 Water Connection.** As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.

**RCM-PU-2 Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

**RCM-PU-3 Water.** The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

**RCM-PU-4 Water.** The Proposed Project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to 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 in accordance with the California Building Energy Efficiency Standards by 20%. 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.

**RCM-PU-5 Solid Waste Recycling - Construction/Demolition.** In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:

- Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

**RCM-PU-6 Solid Waste Recycling – Operational.** In compliance with LAMC Section 66.32 and AB 341, the Project shall incorporate the following:

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.
- Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.

#### Project Design Features

No project design features are identified for the Proposed Project.

## **XX. WILDFIRE**

#### Mitigation Measures

No mitigation measures are required for the Proposed Project.

#### Regulatory Compliance Measures

No regulatory compliance measures are identified for the Proposed Project.

#### Project Design Features



No project design features are identified for the Proposed Project.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

See above mitigation measures, regulatory compliance measures, and project design features.

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## Section 6. Sustainable Communities Environmental Analysis

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This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387).

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. The following analysis discusses the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

# I. Aesthetics

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public

Resources Code Section 21099 would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Senate Bill 743 – Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743),<sup>1</sup> which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Public Resources Code Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “Major Transit Stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Public Resources Code Section 21061.3 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

<sup>1</sup> SB 743 is codified as Public Resources Code Section 21099.

## I. Aesthetics

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perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds of significance that were previously adopted in the *L.A. CEQA Thresholds Guide* (2006). The Project Site is also designated as a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.<sup>2</sup>

SB 743 defines an infill site as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. The Project Site meets this definition. The roadways adjacent to the Project Site are served by several bus lines managed by multiple transit operators that include the Los Angeles County Metropolitan Transportation Authority ("Metro"), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus ("BBB"), and the City of Gardena ("Gtrans"). The Project Site's proximity to the Pico Rail Station, approximately one-half mile west, and the 7<sup>th</sup> Street / Metro Center Station, approximately three-quarters mile north, 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-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Accordingly, the Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

### a) Have a substantial adverse effect on a scenic vista?

**No Impact.** The Proposed Project is classified as a mixed-use residential and commercial project on an infill lot in a TPA. No scenic views or vistas characterize the Project Site or immediately surrounding project area. The Project Site is located in Downtown Los Angeles. The surrounding properties are developed with commercial/retail, multi-family residential, and parking lots. As such, no impact to scenic vistas would occur. ***Pursuant to ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.***

### b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

**No Impact.** The Project Site is developed with four commercial/retail buildings and a surface parking lot. There are no rock outcroppings or unique geologic features on the Project Site. The

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<sup>2</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: <http://zimas.lacity.org/>, accessed July 2021.

## I. Aesthetics

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Project Site is not bordered by or within the viewshed of any designated scenic highways identified in the Mobility Element of the City of Los Angeles General Plan. Neither Main Street, 11<sup>th</sup> Street, 12<sup>th</sup> Street, nor Broadway are designated as a scenic highway. Moreover, the Project Site does not contain any native vegetation or locally protected tree species.<sup>3</sup> There are eight street trees on the public right-of-way on the west side of Main Street and one street tree on the public right-of-way on the north side of 12<sup>th</sup> Street, adjacent to the Project Site. All nine street trees will be removed, eight of which will be replaced.<sup>4</sup> The removal of landscaped street trees would result in less than significant impact as these trees would be replaced in consultation with the Department of Urban Forestry. As such, no impact would occur to scenic resources within a scenic highway. ***Pursuant to ZI No. 2452 and SB 743, aesthetic impacts “shall not be considered significant impacts on the environment” as a matter of law.***

- c) In non-urbanized areas, substantially degrade the existing visual character or quality 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?**

**No Impact.** As discussed above in response to Checklist Questions I (a) and (b), above, the Project Site is located in an urbanized area and is developed with four commercial/retail buildings and a surface parking lot. The Project Site is currently zoned C2-4D-O and has a land use designation of Regional Center Commercial in the Central City Community Plan. There is no height limit for development on the Project Site. Construction of the Proposed Project would entail demolition of all existing buildings and the new construction of a 30-story mixed-use residential and commercial building.

With respect to construction impacts on the visual quality of the Project Site, the Applicant would incorporate PDF-AES-1, which would install temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory measures would further reduce visual impacts caused during the construction of the Proposed Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 14.4.17, the Applicant would also be required to maintain the construction barrier to be free and clear of any unauthorized signs and graffiti within 24 hours of occurrence (see regulatory compliance measure RCM-AES-1). Compliance with these regulatory requirements would ensure the scenic quality of the Project Site during construction.

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<sup>3</sup> *The Tree Resource, Tree Report, Property at 1123-1161 S. Main Street, Los Angeles, CA 90015, October 18, 2018 (See Appendix B).*

<sup>4</sup> *The Tree Resource, Tree Report, Property at 1123-1161 S. Main Street, Los Angeles, CA 90015, October 18, 2018 (See Appendix B). (The ninth tree is only a stump and is not required to be replaced.)*

## Project Design Features

**PDF-AES-1 Construction Barrier.** The Project shall install temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. The Applicant shall ensure through daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of unauthorized signs, trash, graffiti, etc.) throughout the duration of construction.

## Regulatory Compliance Measures

**RCM-AES-1 Signage on Construction Barriers.** Pursuant to LAMC Section 14.4.17 requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 24 hours of occurrence.

With respect to building design, the tower would have multiple elevations. Exterior building materials/features would include concrete, metal panels and screens, and aluminum window frame and glazing. As discussed in further detail in Response to Checklist Question XI, Land Use, the Proposed Project would be in conformance with the Downtown Design Guide, the LAMC, and the applicable provisions of the General Plan governing scenic quality. As such, no impacts would occur with respect to conflicts with applicable zoning or other regulations governing scenic quality. ***Pursuant to ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.***

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

**No Impact.** The determination of whether the Proposed Project results in a significant nighttime illumination impact is generally made considering the following factors: (a) the change in ambient illumination levels as a result of Proposed Project sources; and (b) the extent to which Proposed Project lighting would spill off the Project Site and affect adjacent light-sensitive areas. The Proposed Project does not propose any digital signs or bright illuminated signage that would significantly increase lighting in the local area. Project lighting would be limited to interior lights within residential and retail spaces, which may be visible through windows, and low-level exterior lighting for safety purposes and building identification signage. The Proposed Project would be required to submit a master sign plan as part of the Downtown Design Guide

I. Aesthetics

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checklist identifying all sign types and location in relation to the building structure, walkways, and landscapes areas. As such, no impacts would occur with respect to the Proposed Project's lighting impacts and impacts related to light trespass or glare. ***Pursuant to ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment" as a matter of law.***

**Cumulative Impacts**

**No Impact.** As mentioned above, Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Proposed Project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, cumulative aesthetic impacts would be less than significant. ***Under SB 743 and ZI No. 2452, aesthetic impacts of the Proposed Project shall not be considered a significant impact on the environment.***



## 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.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II. Agriculture and Forestry Resources

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

**No Impact.** A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project Site is currently occupied by four commercial/retail buildings and a surface parking lot. The Project Site is also located in an urbanized area of the City. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.<sup>5</sup> **Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and no impact to agricultural lands would occur.**

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

**No Impact.** The Project Site is located within the jurisdiction of the City and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is zoned C2-4D-O with a General Plan land use designation of Regional Center Commercial. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.<sup>6</sup> **Therefore, the Proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and no impact would occur.**

- 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 C2-4D-O and has a land use designation of Regional Center Commercial in the Central City Community Plan. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. **Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production and no impact would occur.**

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

**No Impact.** The Project Site is occupied by four commercial/retail buildings and a surface parking lot. The Project Site is also located in a highly urbanized area of the City. No forested

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<sup>5</sup> State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed February 2019.

<sup>6</sup> Williamson Act Program, California Division of Land Resource Protection, website [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA\\_15\\_16\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf), accessed February 2019.

## II. Agriculture and Forestry Resources

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lands or natural vegetation exist on or in the vicinity of the Project Site. **Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur.**

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

**No Impact.** A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any “Farmland” category designated by the State of California. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site is not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. **Therefore, the Proposed Project would not result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use and no impact would occur.**

### Cumulative Impacts

**No Impact.** Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.<sup>7</sup> The Project Site is located in a highly urbanized area in the Central City Community within the City and does not include any State-designated agricultural lands or forest uses. **Therefore, no cumulative impact to agricultural or forestry resources would occur.**

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<sup>7</sup> *Ibid.*

### III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Regulatory Setting

##### **Federal**

##### *Clean Air Act*

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of

### III. Air Quality

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additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (“CO”), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), (particulate matter, 2.5 microns (PM<sub>2.5</sub>), particulate matter, 10 microns (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (“Basin”) as a nonattainment area for O<sub>3</sub>, PM<sub>2.5</sub>, and lead.

#### **State**

##### *California Clean Air Act*

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.

##### *California Air Toxics Program*

CARB’s Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

*Air Quality and Land Use Handbook: A Community Health Perspective*

Released by CARB in 2005, the Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.<sup>8</sup> The recommendations are advisory and should not necessarily be interpreted as defined “buffer zones”; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

***Regional***

*South Coast Air Quality Management District*

The Project Site is located within the 6,745-square-mile Basin. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance: This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

*2016 Air Quality Management Plan*

The 2016 Air Quality Management Plan (AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions

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<sup>8</sup> CARB, *Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.*

### III. Air Quality

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forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

#### *Southern California Association of Governments*

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and that continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. To this end, the RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs). Though these areas currently account for just 3 percent of total land in the SCAG region, they are projected to accommodate 51 percent of the region's future household growth and 60 percent of the region's future employment growth by 2040.<sup>9</sup> HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

#### **Local**

#### *City of Los Angeles General Plan Air Quality Element*

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.

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<sup>9</sup> SCAG, 2020 RTP/SCS, September 2020. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

### III. Air Quality

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- Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.
- Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.
- Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
- Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.
- Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

#### **Criteria Pollutants**

For purposes of assessing the Project's air quality impacts, the SCAQMD has established quantitative thresholds for seven criteria pollutants for short-term (construction) emissions and long-term (operational) emissions. These criteria pollutants include the following:

- **Ozone (O<sub>3</sub>)** is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs) and nitrogen oxides (NO<sub>x</sub>), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight.

Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Individuals exercising outdoors, children and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for ozone effects.

- **Carbon Monoxide (CO)**, a colorless, odorless toxic gas that is produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood.

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



altitudes. The effects of increased CO exposure include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

- **Nitrogen dioxide (NO<sub>2</sub>)** is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel), as well as point sources, especially power plants. Of the seven types of NO<sub>x</sub> compounds, NO<sub>2</sub> is the most abundant in the atmosphere.

As ambient concentrations of NO<sub>2</sub> are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO<sub>2</sub> than those indicated by regional monitors. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO<sub>2</sub> at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO<sub>2</sub> in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

- **SO<sub>2</sub>** is a colorless, extremely irritating gas or liquid. SO<sub>2</sub> occurs as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO<sub>2</sub> oxidizes in the atmosphere, it forms sulfates (SO<sub>4</sub>). Collectively, these pollutants are referred to as sulfur oxides (SO<sub>x</sub>).

A few minutes exposure to low levels of SO<sub>2</sub> can result in airway constriction in some asthmatics. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties are observed after acute exposure to SO<sub>2</sub>. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO<sub>2</sub>.

- **Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)** consists of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

A consistent correlation between elevated ambient fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world.

- **Lead (Pb)** is a relatively soft and chemically resistant metal. Lead forms compounds with both organic and inorganic substances. As an air pollutant, lead is present in small particles. Sources of lead emissions in California include a variety of industrial activities.

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Because it was emitted in large amounts from vehicles when leaded gasoline was used, lead is present in many soils (especially urban soils) and can get resuspended into the air.

Because lead is only slowly excreted, exposures to small amounts of lead from a variety of sources can accumulate to harmful levels. Effects from inhalation of lead near the level of the ambient air quality standard include impaired blood formation and nerve conduction. Lead can adversely affect the nervous, reproductive, digestive, immune, and blood-forming systems. Symptoms can include fatigue, anxiety, short-term memory loss, depression, weakness in the extremities, and learning disabilities in children. Lead also causes cancer.

#### **Thresholds of Significance**

Based on criteria set by the SCAQMD<sup>10</sup>, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels:

1. 75 lbs/day for VOC
2. 100 lbs/day for NO<sub>x</sub>
3. 550 lbs/day for CO
4. 150 lbs/day for SO<sub>x</sub>
5. 150 lbs/day for PM<sub>10</sub>
6. 55 lbs/day for PM<sub>2.5</sub>

For operational impacts, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels:

1. 55 lbs/day for VOC
2. 55 lbs/day for NO<sub>x</sub>
3. 550 lbs/day for CO
4. 50 lbs/day for SO<sub>x</sub>
5. 50 lbs/day for PM<sub>10</sub>
6. 55 lbs/day for PM<sub>2.5</sub>

For purposes of determining whether the Proposed Project would exceed the applicable thresholds of significance for construction and operational air quality emissions, the project's

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<sup>10</sup> South Coast Air Quality Management District, *Air Quality Significance Thresholds, Revision April 2019*, website: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed June 2021.

emissions were modeled using the latest release of CalEEMod.2016.3.2, as recommended by the SCAQMD.

### ***Existing Conditions***

The Project Site is located within the South Coast Air Basin. The Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside counties. Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area.

## **PROJECT-SPECIFIC IMPACTS**

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

**Less Than Significant Impact.** A significant air quality impact may occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or the City's Air Quality Element or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of those plans. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the AQMP, which is prepared by the SCAQMD, which is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

### ***Consistency with the AQMP***

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the SCAQMD on March 3, 2017 (2016 AQMP). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.<sup>11</sup>

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<sup>11</sup> *The 2016 AQMP bases its analysis from the 2016-2040 RTP/SCS. In September 2020, SCAG and CARB have since adopted a new 2020 RTP/SCS, now called Connect SoCal. Connect SoCal was*

### III. Air Quality

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This analysis evaluates the two criteria for consistency with regional plans and the regional AQMP adopted by the SCAQMD CEQA Air Quality Handbook:

- 1) Would the Project increase the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMD?
- 2) Would the Project exceed the assumptions utilized in preparing the AQMP?

#### *Criteria 1*

With respect to the first criterion, area air quality planning, including the AQMP, assumes that there will be emissions from new growth but that such emissions would not impede attainment and would actually contribute to the attainment of applicable air quality standards within the Basin if the Proposed Project's emissions are below the SCAQMD's regional thresholds of significance. As discussed in more detail below, the Proposed Project would not result in construction or operational air quality emissions that exceed the SCAQMD thresholds of significance at the Project level.

Additionally, the Proposed Project's construction-related emissions would be temporary in nature, lasting only for the duration of the construction period and would not have a long-term impact on the region's ability to meet state and federal air quality standards. Furthermore, the Proposed Project would be required to comply with applicable SCAQMD rules and regulations for new or modified sources. For example, the Project must comply with SCAQMD Rule 403 for the control of fugitive dust during construction. According to the SCAQMD, the application of water to disturbed areas two times a day has a control efficiency of 55 percent. By meeting SCAQMD rules and regulations, Project construction activities would be consistent with the goals and objectives of the AQMP to improve air quality in the Basin.

With respect to Project operation, the Proposed Project would not introduce substantial stationary sources of emissions. CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As discussed in greater detail below, because intersections in the Project vicinity do not experience extremely high traffic volumes (i.e., 400,000 vehicles per day), CO hotspot emissions would be below the applicable thresholds of significance. Therefore, the Proposed Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

An analysis of potential localized operational impacts from on-site activities was conducted. As shown in Table 6.5 in the analysis below, localized NO<sub>2</sub> as NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> operational impacts would be less than significant. Thus, the proposed Project would not have the potential to increase the frequency or severity of existing air quality violations or cause or contribute to new air quality violations. As the Proposed Project would not exceed any of the

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*determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The SCAQMD is currently working on a 2022 AQMP, which will base its analysis from Connect SoCal.*

state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

*Criteria 2*

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to these criteria.

In addition, SCAG approved their 2016 RTP/SCS that includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and the State Implementation Plan (SIP) for the Basin, are based on SCAG's 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP. As discussed in Sections 6.XI, Land Use Planning, and 6.XIV, Population and Housing, the Proposed Project would not exceed the population and housing projections of the most recent RTP/SCS for the Los Angeles subregion, and would therefore be consistent with the assumptions utilized in preparing the AQMP.

Regarding feasible air quality mitigation measures, the Proposed Project does not have significant impacts that require mitigation. Additionally, the Proposed Project would comply with applicable regulatory measures enforced by the SCAQMD. SCAQMD enforces stationary and mobile source compliance with respect to both operational and construction emissions. The Proposed Project would adhere to current and applicable regulatory compliance measures (including SCAQMD Rule 403: Fugitive Dust, Rule 1113: Architectural Coating, Rule 1108: Cutback Asphalt, Rule 1138: Control of Emissions from Restaurant Operations, and Rule 1146.2: Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters). As such, the Proposed Project is consistent with this criterion.

With respect to land use policies set forth in the AQMP, as discussed in Section XIV(a), the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the RTP/SCS to increase housing density within close proximity to HQTAs. A HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development and jobs within a half of a mile (walking distance) of several Metro bus lines that connect to all regions of the Los Angeles area. Thus, the Project Site's location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips. The Project Site is also located in a TPA as defined by CEQA Sections 21099 and

21064.3. Studies by the California Department of Transportation, the U.S. Environmental Protection Agency and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Proposed Project's mixed-use nature and close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. ***Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the RTP/SCS (as discussed in greater detail in response to Checklist Question VIII, Greenhouse Gas Emissions), the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.***

#### ***Consistency with the City's Air Quality Element***

The City's Air Quality Element sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies. Goals, objectives, and policies of the Air Quality Element that are relevant to the Proposed Project include minimizing traffic congestion and increasing energy efficiency, as well as reducing air pollutant emissions consistent with the AQMP. A detailed analysis of the consistency of the Proposed Project with relevant policies in the City's General Plan Air Quality Element is presented in Table 6.1, Project Consistency with Applicable Policies of the General Plan Air Quality Element.

As shown in Table 6.1, the Proposed Project would be consistent with the applicable goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, impacts related to consistency with the applicable air quality policies in the General Plan would be less than significant. ***In summary, the Proposed Project would be consistent with applicable local and regional plans pertaining to air quality including the City of Los Angeles Air Quality Element and the AQMP. Therefore, the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts associated with plan consistency would be less than significant.***

**Table 6.1  
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

<b>Policy</b>	<b>Consistency Analysis</b>
<p><b>Goal 1:</b> Good air quality and mobility in an environment of continued population growth and healthy economic structure.</p>	<p><b>Consistent.</b> Discussed in more detail below, the Proposed Project would not exceed any regional air quality standards during operation. The Proposed Project would place dwelling units and ground-floor commercial space in a TPA, thereby minimizing demands for vehicles and reducing regional vehicle miles traveled. The Proposed Project would thereby encourage walking from the new residential units to the on-site and nearby commercial uses. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The Proposed Project would improve the public sidewalks in accordance with the Mobility Plan standards adjacent to Project Site on Main Street and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project would provide on-site bicycle spaces to promote travel by bicycle. Thus, the Proposed Project would be consistent with this goal.</p>
<p><b>Objective 1.1:</b> It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.</p>	<p><b>Consistent.</b> As discussed herein, the Proposed Project would be consistent with the 2016 AQMP and would not exceed regional air quality standards during operation. Additionally, the Project Site's location in proximity to transit, services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.</p>
<p><b>Objective 1.3:</b> It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.</p>	<p><b>Consistent.</b> The Proposed Project would adhere to SCAQMD Rules that regulate particulate emissions. Construction workers would not utilize any unpaved roads, but may utilize the western parking lot during construction to avoid parking on the surrounding streets. During the earthwork phases of construction, the Proposed Project would comply with SCAQMD Rule 403, which requires dust control measures that would reduce particulate air pollutants from construction activity. The Project Site would be watered to suppress dust emissions as required through SCAQMD Rule 403.</p>
<p><b>Policy 1.3.1:</b> Minimize particulate emissions from construction sites.</p>	<p><b>Consistent.</b> Construction activities associated with the Proposed Project would be required to comply with CARB's In-Use Off-Road Diesel Regulation, which controls the construction fleet engine fuel efficiency, and with CARB's Airborne</p>

**Table 6.1  
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

	<p>Toxic Control Measure (ATCM), which also sets requirements for construction fleet engines and horsepower. Further, the Proposed Project would comply with SCAQMD Rule 403—Fugitive Dust, which requires appropriate dust control measures to be implemented during each phase of development. Accordingly, particulate emissions at the Project Site during construction of the Proposed Project would be minimized. During pre-demolition abatement activities, the Proposed Project would use a negative pressure system to seal the building before removing all potentially present ACMs and ensure no emissions are released into the air. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><b>Policy 1.3.2:</b> Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.</p>	<p><b>Consistent.</b> The Proposed Project would not utilize any unpaved roads, but may utilize the western parking lot during construction to avoid construction workers parking on the surrounding streets. During the earthwork phases of construction, the Proposed Project would incorporate measures that would reduce particulate air pollutants from construction activity. The Project Site would be watered to suppress dust emissions as required through SCAQMD Rule 403. Therefore, the Proposed Project would be consistent with this policy. See also description under Policy 1.3.1.</p>
<p><b>Goal 2:</b> Less reliance on single-occupant vehicles with fewer commute and non-work trips.</p>	<p><b>Consistent.</b> The Proposed Project would place new dwelling units and ground-floor commercial space in a TPA and HQTAs, thereby minimizing demands for vehicles and reducing regional vehicle miles traveled. The Proposed Project would thereby encourage walking from the new residential units to the on-site and nearby commercial uses. The Project Site’s location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Additionally, the Proposed Project would include bicycle parking on-site to encourage travel by bicycle. Therefore, the Proposed Project would promote other modes of travel besides single-occupant vehicles and would be consistent with this goal.</p>
<p><b>Objective 2.1:</b> It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.</p>	<p><b>Consistent.</b> As mentioned above, the Project Site’s location near mass transit options and proximity to services, retail stores, and employment opportunities promotes other modes of transportation, such as walking and bicycling. This option for future residents and employees of the Project Site would serve to reduce trips and</p>



**Table 6.1  
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

	<p>VMT. As such, the Proposed Project would be consistent with this objective.</p>
<p><b>Goal 4:</b> Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.</p>	<p><b>Consistent.</b> The Proposed Project would provide a variety of land uses, including multi-family residential and commercial/retail space, which are consistent with the surrounding land uses. The Project Site is developed with existing commercial uses and is surrounded by a variety of mixed-use residential and commercial buildings, commercial, office, and light industrial land uses. Thus, the introduction of a mixed-use project with retail and multi-family land uses would be compatible with the existing established land uses in the project area. The Proposed Project would also provide direct bicycle and pedestrian access to Main Street, which connect to major transit lines in the Los Angeles area. Thus, this would reduce VMT, promote alternatives to driving, and aim to improve air quality. The Project Site is located within 0.6 mile from the Pico Rail Station; 0.9 mile from the 7<sup>th</sup> Street/Metro Center Station; and ½ mile from numerous bus lines, which would reduce overall VMT. The land uses proposed and the location of the Project Site would promote an efficient land use pattern that would be served by public transportation and would overall reduce air quality impacts. Further, as discussed in detail below, the Proposed Project would result in less than significant impacts with regard to regional and localized air quality emissions. Thus, based on the above, the Proposed Project would minimize impacts from future land use development by addressing the relationship between land use, transportation, and air quality, and would be consistent with this goal.</p>
<p><b>Objective 4.2:</b> It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.</p>	<p><b>Consistent.</b> The Proposed Project would provide a mix of residential and commercial land uses in an area with a variety of entertainment, restaurant, retail, and employment services that would allow residents and employees to live and work in close proximity. The availability of diverse land uses within close proximity and with transit options would promote other modes of transportation such as walking, biking, and public transportation. This would serve to reduce vehicle trips and VMTs associated with the proposed and surrounding land uses. See also description under Goal 4, above.</p>
<p><b>Policy 4.2.2:</b> Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.</p>	<p><b>Consistent.</b> The Proposed Project would include a mix of residential and commercial uses located in the Downtown area of the City of Los Angeles.</p>

**Table 6.1  
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

	<p>The Proposed Project would provide accessibility to mass transit, jobs, and shopping centers along Main Street. Additionally, due to the variety of mixed uses proposed by the Project on site, the residents would have access to a variety of commercial/retail uses, which would provide access to places of employment and shopping. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><b>Policy 4.2.3:</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p><b>Consistent.</b> The design of the Proposed Project would encourage patrons to walk and bike to and from the Project Site. The Proposed Project would provide pedestrian-oriented connectivity along Main Street, which would provide direct street frontage and pedestrian access to the Project Site, compared to the existing on-site surface parking lot that buffers commercial uses and the sidewalks. In addition, through the implementation of the L.A. Green Building Code, the Proposed Project would be required to provide the necessary infrastructure for electric vehicle charging stations, and on-site bicycle parking to promote the use of bicycle transportation as an alternative to the vehicle. The Proposed Project would also include a bicycle repair workstation and shower facilities to further encourage bicycle travel among residents and employees. Thus, the Proposed Project would be consistent with this policy.</p>
<p><b>Policy 4.2.5:</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.</p>	<p><b>Consistent.</b> The Proposed Project is an infill mixed-use residential and commercial development. The Proposed Project would include neighborhood-serving commercial retail and restaurant uses that would serve Project residents and the Project vicinity, thereby reducing VMT that would otherwise be generated to travel to similar commercial and retail uses elsewhere in the community. In addition, the Proposed Project would include on-site bicycle parking to encourage alternate modes of transportation. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><b>Policy 5.1.2:</b> Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.</p>	<p><b>Consistent.</b> As discussed in more detail in Section 6.VIII, Greenhouse Gas Emissions of this SCEA, the implementation of the Project Design Features together with the requirements established by the City's Green Building Code would reduce energy consumption for the Proposed Project. The Proposed Project would be required to meet the Title 24 2019 Standards, which includes stringent Building Energy</p>

**Table 6.1  
Project Consistency with Applicable Policies of the General Plan Air Quality Element**

	Efficiency Standards. Therefore, the Proposed Project would be consistent with this policy.
<p><b>Policy 5.1.4:</b> Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.</p>	<p><b>Consistent.</b> As stated above, compliance with the City’s Green Building Code would reduce energy consumption for the Proposed Project. Furthermore, operations on the Project Site would continue to be subject to requirements set forth in AB 939 requiring each city and county to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Additionally, as required by the California Solid Waste Reuse and Recycling Access Act of 1991, the Applicant would be required to provide adequate storage areas for the collection and storage of recyclable waste materials, which would reduce air emissions associated with said waste. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><i>Source(s): Policies applicable to the Project were derived from the City’s General Plan Air Quality Element, Adopted November 1992; Project consistency analysis by Parker Environmental Consultants, 2021.</i></p>	

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact.** A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM<sub>10</sub> and PM<sub>2.5</sub>, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project’s contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development 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. Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

As discussed below, the Proposed Project would not generate construction or operational

emissions that exceed the SCAQMD's recommended regional thresholds of significance. ***Therefore, the Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.***

### **Construction Emissions**

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 30 months, with a final buildout year in 2026. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in five main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; (4) paving; and (5) architectural coating/finishing. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate PM<sub>2.5</sub> and PM<sub>10</sub> emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO<sub>x</sub> emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*) as recommended by the SCAQMD. Table 6.2, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures and compliance with the following AQMD Rules and regulations would be implemented as part of the Proposed Project during each phase of development (see RCM-AQ-1 through RCM-AQ-8, below). The following SCAQMD Rules and regulations are required in conjunction with the Proposed Project.

**Table 6.2  
Estimated Peak Daily Construction Emissions**

Emission Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2023	3.55	37.61	28.77	0.07	4.76	2.94
2024	3.67	35.49	34.19	0.09	7.94	3.66
2025	24.41	22.68	33.37	0.09	4.76	1.78
2026	24.40	7.20	13.09	0.02	1.04	0.51
<b>Maximum Daily Construction Emissions:</b>	<b>24.41</b>	<b>37.61</b>	<b>34.19</b>	<b>0.09</b>	<b>7.94</b>	<b>3.66</b>
<b>SCAQMD Daily Significance Thresholds:</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

*Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. The interface on CalEEMod (Version 2016.3.2) lists these rules under the “Mitigation” tab, when they are actually required rules by the SCAQMD. The term “Mitigation” in CalEEMod is defined differently than “Mitigation Measures” in this SCEA. The model does not allow for these regulatory measures to be implemented in the “unmitigated project” impact scenario. As such, the values that appear under the “Mitigated” results columns are reflective of the Proposed Project impacts that are compliant with required regulations. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.*

### Regulatory Compliance Measures

#### RCM-AQ-1 Site Clearing, Grading and Construction Activities

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
  - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
  - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
  - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
  - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
  - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
  - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
  - Trucks having no current hauling activity shall not idle but be turned off.

### III. Air Quality

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- RCM-AQ-2** The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.
- RCM-AQ-3** The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).
- RCM-AQ-4** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- RCM-AQ-5** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- RCM-AQ-6** The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.
- RCM-AQ-7** The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt.
- RCM-AQ-8** The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

As shown in Table 6.1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. ***Therefore, construction impacts are considered to be less than significant.***

#### Operational Emissions

##### Existing Emissions

The Project Site is currently developed with four commercial buildings and a surface parking lot. The existing conditions baseline reflect existing daily operational emissions from the actively used portions of the existing Project Site, which is approximately 26,710 square feet.<sup>12</sup> This

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<sup>12</sup> *The Project Site is developed with 28,110 square feet of retail space. However, at the time the environmental analysis commenced only 26,710 square feet of the site was occupied with active retail land uses and 1,400 square feet was vacant. (See Appendix A, Project Site Existing Occupancy Records, in the Non-CEQA Transportation Assessment provided in Appendix J.2 to this SCEA.)*

III. Air Quality

yields a conservative approach as the net Project emissions will reflect a higher estimate than if the existing conditions baseline was reflective of the entire 28,110 square feet of existing buildings. The existing use generates air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2016.3.2*). As shown in Table 6.3, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

**Table 6.3  
Existing Daily Operational Emissions from Project Site**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Area Sources	0.60	<0.01	<0.01	0.00	<0.01	<0.01
Energy Sources	<0.01	0.01	0.01	<0.01	<0.01	<0.01
Mobile Sources	2.22	11.13	30.04	0.10	7.44	2.06
<b>Total Emissions</b>	<b>2.83</b>	<b>11.15</b>	<b>30.06</b>	<b>0.10</b>	<b>7.45</b>	<b>2.07</b>
<b>Wintertime (Non-Smog Season) Emissions</b>						
Area Sources	0.60	<0.01	<0.01	0.00	<0.01	<0.01
Energy Sources	<0.01	0.01	0.01	<0.01	<0.01	<0.01
Mobile Sources	2.13	11.42	28.15	0.09	7.45	2.07
<b>Total Emissions</b>	<b>2.73</b>	<b>11.43</b>	<b>28.17</b>	<b>0.09</b>	<b>7.45</b>	<b>2.07</b>
<i>Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.</i>						

Proposed Project Emissions

The Proposed Project would result in the demolition of the existing commercial buildings and the development of a 30-story 343,447 square-foot mixed-use residential and commercial building. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (*Version 2016.3.2*). The results of these calculations are presented in Table 6.4, Proposed Project Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. **Therefore, impacts associated with regional operational emissions from the Proposed Project would not conflict with or obstruct implementation of the applicable air quality plan and air quality impacts would be less than significant.**

**Regulatory Compliance Measures**

**RCM-AQ-9** New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

**Table 6.4  
Proposed Project Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Summertime (Smog Season) Emissions</b>						
Area Sources	8.36	0.35	29.96	<0.01	0.17	0.17
Energy Sources	0.10	0.81	0.35	<0.01	0.07	0.07
Mobile Sources	1.67	7.82	21.34	0.09	8.52	2.32
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
<b>Total Project Emissions</b>	<b>10.95</b>	<b>12.65</b>	<b>53.75</b>	<b>0.10</b>	<b>8.87</b>	<b>2.68</b>
<i>Less Existing On-Site Emissions</i>	<i>(2.83)</i>	<i>(11.15)</i>	<i>(30.06)</i>	<i>(0.10)</i>	<i>(7.45)</i>	<i>(2.07)</i>
<b>NET Project Emissions</b>	<b>8.12</b>	<b>1.50</b>	<b>23.69</b>	<b>0.00</b>	<b>1.42</b>	<b>0.61</b>
<b>SCAQMD Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Potentially Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Wintertime (Non-Smog Season) Emissions</b>						
Area Sources	8.36	0.35	29.96	<0.01	0.17	0.17
Energy Sources	0.10	0.81	0.35	<0.01	0.07	0.07
Mobile Sources	1.58	7.93	19.94	0.09	8.52	2.32
Stationary Sources	0.82	3.67	2.09	<0.01	0.12	0.12
<b>Total Project Emissions</b>	<b>10.86</b>	<b>12.76</b>	<b>52.34</b>	<b>0.10</b>	<b>8.87</b>	<b>2.68</b>
<i>Less Existing On-Site Emissions</i>	<i>(2.73)</i>	<i>(11.43)</i>	<i>(28.17)</i>	<i>(0.09)</i>	<i>(7.45)</i>	<i>(2.07)</i>
<b>NET Project Emissions</b>	<b>8.13</b>	<b>1.33</b>	<b>24.17</b>	<b>0.01</b>	<b>1.42</b>	<b>0.61</b>
<b>SCAQMD Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Potentially Significant Impact?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.						

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

**Less Than Significant Impact.** A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term



health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.<sup>13</sup>

### **Localized Significance Thresholds**

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD,<sup>14</sup> apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM<sub>10</sub>, the LSTs were derived based on requirements in SCAQMD Rule 403 – Fugitive Dust. For PM<sub>2.5</sub>, the LSTs were derived based on a general ratio of PM<sub>2.5</sub> to PM<sub>10</sub> for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD’s 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the portion of the Project Site to be graded is approximately 1.12 acres, the one-acre LSTs were conservatively applied for the Proposed Project. There are five sensitive receptors located within 500 feet of the Project Site that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project. These sensitive receptors are identified in Figure 6.1. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a one-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions for each construction phase.

### **Localized Construction Emissions**

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 6.5, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered

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<sup>13</sup> South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993, page 5-1.

<sup>14</sup> South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008.

areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. **Therefore, with implementation of the regulatory code compliance measures identified above, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.**

**Table 6.5  
Localized On-Site Peak Daily Construction Emissions**

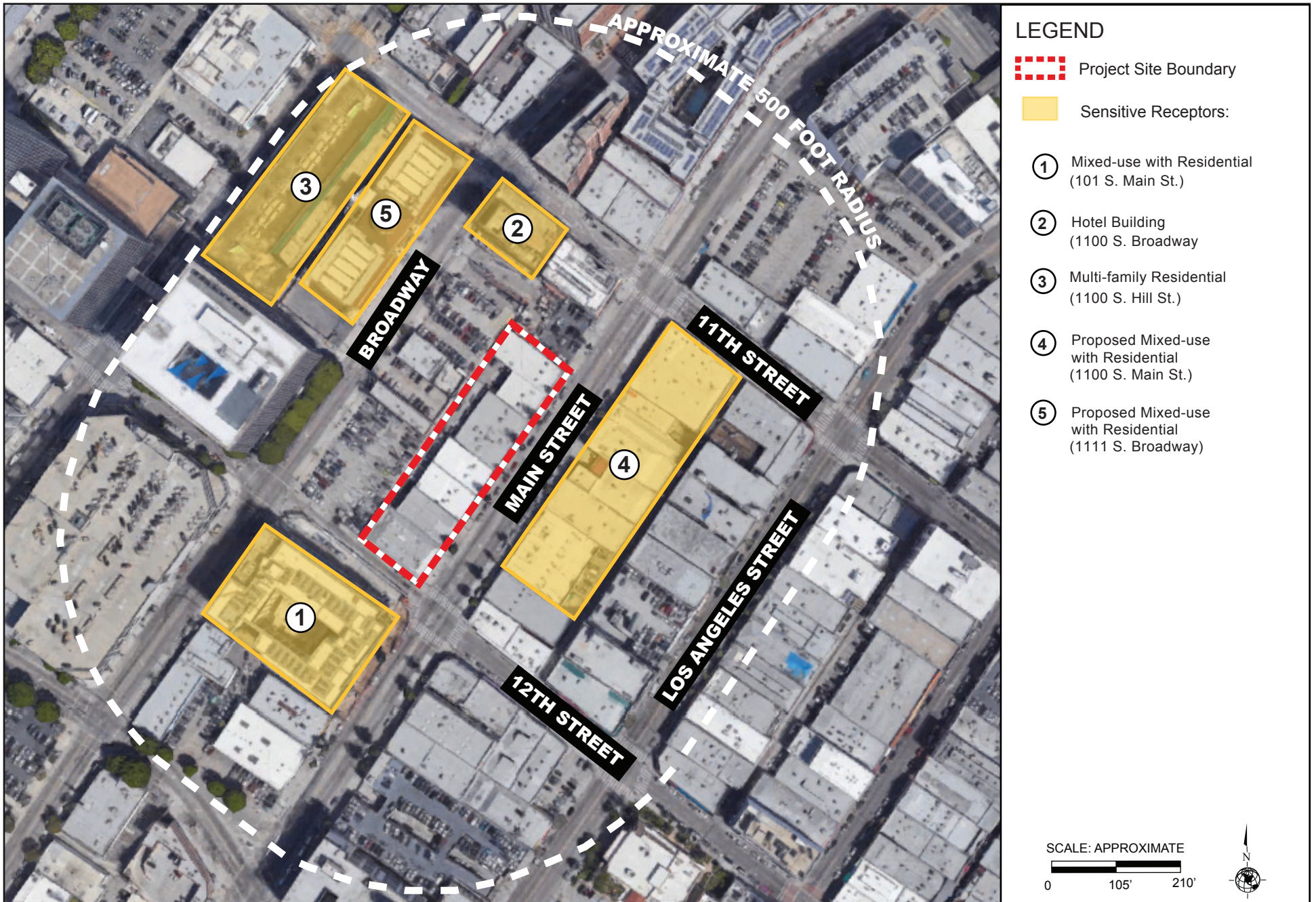
Construction Phase <sup>a</sup>	Total On-site Emissions (Pounds per Day)			
	NO <sub>x</sub> <sup>b</sup>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Demolition/Site Clearing	19.65	22.42	1.65	0.89
Grading/Excavation	35.76	27.87	2.99	1.52
Building Construction	18.80	23.23	0.79	0.77
Paving	4.29	7.29	0.21	0.19
Architectural Coatings	7.07	11.27	0.31	0.31
<b>SCAQMD Localized Thresholds <sup>c</sup></b>	<b>74</b>	<b>680</b>	<b>5</b>	<b>3</b>
<i>Potentially Significant Impact?</i>	No	No	No	No

<sup>a</sup> The localized thresholds for all phases are based on a receptor within a distance of 25 meters in SCAQMD's SRA 1 for a Project Site of one acre.  
<sup>b</sup> The localized thresholds listed for NO<sub>x</sub> takes into consideration the gradual conversion of NO<sub>x</sub> to NO<sub>2</sub>, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO<sub>x</sub> emissions is focused on NO<sub>2</sub> levels as they are associated with adverse health effects.  
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

**Localized Operational Emissions**

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS. The Basin has been in attainment for CO since 2007, and CO levels in the Source Receptor Area (SRA) 1 remain substantially below the federal and state standards. The maximum CO levels during 2016 were recorded at 1.9 ppm (one-hour average) and 1.4 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).<sup>15</sup> In its 2003 AQMP, the SCAQMD conducted CO hot-spot analyses at the four worst-case intersections in the Basin. The SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an

<sup>15</sup> The most recent annual ambient air quality data is for the year 2016, <http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2016-air-quality-data-tables.pdf?sfvrsn=14>, accessed March 2019.



Source: Google Earth, Aerial View, 2018.

average daily traffic volume of approximately 100,000 vehicles per day. The data provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at all four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing [2003] background CO concentrations, the worst-case CO levels in the Basin was estimated to be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), respectively, which is below the CO thresholds of significance for both the CAAQS and NAAQS. The AQMP therefore concluded that because the Basin is in attainment for CO, and the studied congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. Comparatively, recent ambient CO levels in 2016 are substantially lower than they were in 2013. The volume of traffic at the closest study intersections, Intersection #5, Main Street and 11<sup>th</sup> Street; and Intersection #6, Main Street and 12<sup>th</sup> Street are substantially lower than the studied intersections in the 2003 AQMP study. Therefore, it is reasonable to conclude that the Proposed Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. ***Therefore, the Proposed Project would not expose sensitive receptors to substantial pollutant concentrations and no further analysis for CO hotspots is warranted. Localized operational emissions would therefore be less than significant.***

### Toxic Air Contaminants (TAC)

#### ***Construction Emissions***

The Proposed Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 30 months, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (30 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact.

**Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.**

### **Operational Emissions**

The Proposed Project consists of a mixed-use residential and commercial development. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such no significant toxic airborne emissions would result from Proposed Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. **Therefore, impacts associated with the release of toxic air contaminants would be less than significant.**

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

**Less Than Significant Impact.** A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Proposed Project would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. **Therefore, potential operational odor impacts would be less than significant.**

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would result in an increase in construction and operational emissions in an already highly urbanized area of the City.

### **AQMP Consistency**

Cumulative development can affect implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Proposed Project is consistent

### III. Air Quality

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with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. **Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.**

#### Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. **Therefore, cumulative air quality impacts would be less than significant.**

#### Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the Proposed Project and each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Moreover, none of the related projects are located in close enough proximity to the Proposed Project as to cause cumulative odor impacts. Furthermore, based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would not combine with other projects to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and 1139 (Odors) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Proposed Project's long-term operations phase. **Thus, cumulative odor impacts would be less than significant.**

# IV. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following section summarizes and incorporates the reference information from the following reports (contained in Appendix B to this SCEA):

- The Tree Resource, Tree Report, 1123-1161 S. Main Street, October 18, 2018.

## PROJECT-SPECIFIC IMPACTS

- 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 Wildlife or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is located in an urbanized area in the City and is improved with four commercial/retail buildings and surface parking. The Project Site does not contain any 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 Wildlife or U.S. Fish and Wildlife Service. Based on the Proposed Project's Tree Report, dated October 18, 2018 (Appendix B to this SCEA), there are nine street trees (one of which is just a stump and not subject to replacement) in the public right-of-way surrounding the Project Site: eight trees along Main Street and one tree along 12<sup>th</sup> Street. No trees are located on the Project Site. The Tree Report concluded there are no protected native tree species located in the public right-of-way. All of the existing street trees will be removed for the Proposed Project. The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (see RCM-BIO-1, below). **Therefore, the Proposed Project would have a less than significant impact upon removal of non-protected trees.**

Additionally, the removal of vegetation and disturbances to potential bird habitat may result in take of nesting native bird species. However, all 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 Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The Project Applicant will be required to ensure compliance with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due to the removal of the existing tree located on the Project Site. As a standard practice, the Department of Building and Safety requires regulatory compliance measure RCM-BIO-2, which would avoid any potential impacts related to native birds during construction activities. **Therefore, with adherence to existing laws and regulations, the Proposed Project would have a less than significant impact on sensitive biological species or habitat.**



## Regulatory Compliance Measures

**RCM-BIO-1 Tree Removal (Public Right-of-Way).** Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. The number, type and size of replacement trees to be provided in the public right-of-way shall be provided per the current Urban Forestry Division standards and to the satisfaction of the Department of Public Works.

**RCM-BIO-2: Habitat Modification (Nesting Native Birds).** Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State

IV. Biological Resources

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and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.

- 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 Wildlife or U.S. Fish and Wildlife Service?**

**No Impact.** A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by four commercial/retail buildings and surface parking. No riparian or other sensitive natural community is located on or adjacent to the Project Site. **Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.**

- 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.** A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act. The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. **Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Question IV(b), above), and no impacts to riparian or wetland habitats would occur with implementation of the Proposed 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.** A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is improved with four commercial/retail buildings and surface parking. Vegetation in the vicinity of the Project is limited to ornamental landscaping. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. **Therefore, the Proposed Project would not interfere with the movement of any resident or migratory fish or wildlife species.**

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

**Less Than Significant Impact.** A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 186,873. There are nine street trees in the public right-of-way surrounding the Project Site. All street trees in the public right-of-way are expected to be removed as a result of the Proposed Project. These street trees are not protected native tree species.<sup>16</sup> All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project Site proposed for removal will be replaced at a 2:1 ratio with a minimum 24-inch box tree pursuant to the Department of Urban Forestry's permit conditions. As discussed above, the Proposed Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory non-game birds. ***Thus, any impacts upon the loss of on-site trees 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.** A significant impact would occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. ***Therefore, no impact would occur with implementation of the Proposed Project.***

**Cumulative Impacts**

**Less Than Significant Impact.** The Proposed Project would have a less than significant impact upon biological resources with adherence to applicable regulatory compliance measures. Development of the Proposed Project in combination with related projects 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 as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Moreover, development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. ***Thus, cumulative impacts to biological resources would be less than significant.***

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<sup>16</sup> *The Tree Resource, Tree Report, 1123-1161 S. Main Street, Los Angeles, CA 90015, October 18, 2018.*

# V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))??	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section summarizes and incorporates by reference information from the following reports:

- Historic Resource Assessment, 1159-1165 Main Street (“Historic Resource Assessment”), prepared by Historic Preservation Consulting, dated May 2019.
- Archaeological Resources Recommendations for the Main Street Tower Project, Los Angeles, California (“Archaeological Resource Assessment”), prepared by Dudek, dated March 2019.

These reports are included as Appendix C of this SCEA.

## PROJECT-SPECIFIC IMPACTS

- a) **Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?**

**Less Than Significant Impact.** A significant impact may occur if the Proposed Project results in a substantial adverse change in the significance of a historic resource. 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,

## V. Cultural Resources

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relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.<sup>17</sup>

Section 15064.5(b)(2) of the CEQA Guidelines provides that “[t]he significance of an historical resource is materially impaired when a project:

*(a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or*

*(b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or*

*(c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.*

The Project Site is currently occupied by four commercial buildings and paved surface parking. The Proposed Project includes demolishing the existing buildings and constructing a 30-story mixed-use residential and commercial building.

According to the Historic Resource Assessment, three of the four commercial buildings on the Project Site (1147-1155 South Main Street) were constructed circa 1986 of concrete block. Given their recent dates of construction, complete lack of architectural distinction and use as retail stores and warehouses, none of the three buildings meet the threshold required for National and California eligibility for buildings of the recent past. Therefore, no further evaluation of these three properties will be provided.

The Historic Resource Assessment provides an analysis of the commercial/industrial building located on the Project Site at 1159-1165 South Main Street (“subject property”). This property was constructed circa 1921 and was historically used as an auto-related business.

The City of Los Angeles’ Office of Historic Resources recently completed a citywide historic resource survey known as SurveyLA. As part of the survey, historic context statements and survey reports relevant to study of the Project Site were prepared, including for industrial development in the City of Los Angeles, and for the Central City Community Plan Area. The subject property was not identified as a potential historical resource in either SurveyLA document. In addition, the subject property has not ever been previously surveyed for historic or

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<sup>17</sup> CEQA Guidelines, Section 15064.5(b)(1).

architectural significance; this historic resource assessment is the first known assessment of the subject property.

The Historic Resource Assessment evaluates the subject property for historic and architectural significance for eligibility for listing in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), and for local designation, both individually as a Historic Cultural Monument (HCM), and as part of a potential historic district or Historic Preservation Overlay Zone (HPOZ). Because eligibility criteria for local HCM designation align in large degree with eligibility criteria for National and California Registers, the following evaluation considers eligibility under each of the criteria at federal, state and local levels under a single heading.

*Criterion A/1/1: Is associated with events that have made a significant contribution to the broad patterns of our history and cultural heritage.*

The subject property was evaluated under criterion A/1/1 for its association with its first tenant for whom the building was constructed, Spencer Kennelly, Inc., and the early history of the automobile in Los Angeles, specifically car showrooms. As established in this report, the history of the automobile industry is an important historic context in Los Angeles. SurveyLA provides the following eligibility standards for this property type:

- Originally constructed to sell, and often provide servicing for, the automobile
- Demonstrates convenient automobile access from the street
- Is an excellent example of the property type
- Contains design and site layout features that reflect the needs of selling and servicing the automobile
- Was constructed during the period of significance [1920-1970]

While the subject property meets two of the eligibility criteria, as it was constructed during the period of significance as an automobile showroom, it does not demonstrate automobile access from the street, it does not contain design or site layout features that reflect the needs of selling and servicing automobiles and is therefore not an excellent example of the property type. As the subject property does not meet the eligibility criteria, it is not significant as an early car showroom and it is therefore not eligible under criterion A/1/1. SurveyLA findings for the Central City CPA identified a number of properties that appear eligible as automobile showrooms, specifically another Chevrolet showroom a few blocks from the subject property at the corner of South Hope Street and 12<sup>th</sup> Street. Thus, there are better examples of the property type extant in the CPA.

*Criterion B/2/2: Is associated with the lives of persons important in our past.*

Although several individuals have been associated with the subject property, none rise to the level required to warrant consideration under Criterion B/2/2. Spencer Kennelly and Henry Novisoff both seem to have managed successful businesses at the subject property. However,

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neither appear to have made a notable contribution to their field of selling used Chevrolet cars or selling tires, respectively. There is no evidence either person substantially changed the history of those fields. Therefore, the subject property is not eligible under criterion B/2/2.

*Criterion C/3/3: 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.*

While the building at the subject property was designed by John Montgomery Cooper, it does not appear eligible under criterion C/3/3. John Montgomery Cooper was a notable Los Angeles architect. He worked on a variety of properties throughout his career, including commercial, residential, and industrial properties. Several of his notable buildings are extant and listed in the National Register, including the Hollywood Knickerbocker Hotel, Grether & Grether Building, and Roxie Theater. In contrast to these other buildings, the subject property is very modestly-scaled without any recognizable architectural style and does not appear to be part of his important work. In addition, the subject property has been altered numerous times and no longer reflects its original architectural design. Therefore, the subject property is not eligible under criterion C/3/3.

*Criterion D/4: Has yielded, or may be likely to yield, information important in prehistory or history.*

The subject property cannot be reasonably expected to yield information important in prehistory or history; therefore, it is not eligible under Criterion D/4.

### *Historic District*

As noted above, a HPOZ “is any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural, or aesthetic significance.” The subject property is not part of a distinguishable unified neighborhood or area. The surrounding neighborhood contains a mix of building uses, including residential, commercial, and industrial, from a variety of time periods, including a substantial amount of relatively new construction. There is no significant concentration, linkage, or continuity of sites, buildings, structures or objects united historically or aesthetically. In addition, there is not a strong sense of time and place. Therefore, there does not appear to be any potential National or California Register historic district or HPOZ to which the subject property could contribute.

### *Adjacent and Nearby Historical Resources*

There are no identified historical resources located adjacent to the subject property. The closest historical resources, the Herald-Examiner Building at 1111 South Broadway (formally determined eligible for listing in the National Register, listed in the California Register and HCM #178) and Commercial Club Building at 1100 South Broadway (HCM #1075) are both located at the intersection of South Broadway and 11<sup>th</sup> Street. SurveyLA did not identify any potential

## V. Cultural Resources

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historical resources or potential historic districts in the vicinity of the subject property. The Proposed Project would have no direct impacts on these two historic buildings. There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have a less than significant impact on the historic and potentially historic resources near the Project Site, as the Proposed Project does not directly abut these historic resources and would not result in a substantial adverse change to the immediate surroundings of this historical resource to the degree it would no longer be eligible for listing under national, state, or local landmark designation programs. These historic resources would continue to be eligible for listing as historical resources defined by CEQA. No mitigation is required or recommended. ***Therefore, the development of the Proposed Project would not cause a substantial adverse change in the significance of a historical resource and impacts to historical resources would be less than significant.***

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?**

**Less Than Significant Impact.** A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources, which presently exist within the Project Site. The Project Site has been previously developed and graded. The Project Site and immediate surrounding areas do not contain any known archaeological resources.<sup>18</sup> For purposes of assessing the Project's potential impacts upon archaeological resources, the following analysis summarizes the findings of the Archaeological Resources Recommendations for the Main Street Tower Project, Los Angeles, California ("Archaeological Resource Assessment"), prepared by Dudek, dated March 2019. (See Appendix C to this SCEA).

### **SCCIC Records Search**

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) on January 31, 2019 for the proposed Project Site and surrounding 0.5-mile search buffer. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, and ethnographic references. Additional consulted sources included historical maps of the Project Site, the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility.

Results of the cultural resources records search indicated that 38 previous cultural resource studies have been conducted within the records search area between 1978 and 2017 (Table 1

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<sup>18</sup> *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric & Historical Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*



## V. Cultural Resources

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of the Archaeological Resource Assessment). None of these studies identified overlap the Project Site.

Forty Seven (47) previously recorded cultural resources have also been documented within a 0.5-mile of the Project Site. None of these intersect the Project Site. Forty six (46) resources identified during the records search are historic-era buildings, and the remaining resource consists of a historic-era trash deposit. As analyzed under Tribal Cultural Resources, (see Response to Checklist Question XVIII (a) and (b), Tribal Cultural Resources, below) no cultural resources of Native American origin are documented within the Project Site or surrounding 0.5-mile search area of files held at the SCCIC.

### ***Native American Correspondence***

#### *NAHC Sacred Lands File Search*

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on January 29, 2019. The NAHC emailed a response on January 31, 2019, which indicated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. The NAHC provided the contact information of ten individuals and/or entities with whom to contact along with the SLF search results. Documents related to the NAHC SLF search are included in Attachment C of the Archaeological Resource Assessment.

### ***Archival Research***

Dudek consulted historic aerials, accessed through University of California Santa Barbara's Map and Imagery Laboratory, Sanborn Maps, accessed through the Los Angeles Public Library, and historical maps accessed through the Los Angeles Public Library, the Huntington Map Library, and the David Rumsey Map Collection, to understand the development of the Project Site. Three historical maps showing the City of Los Angeles in 1884, 1887, and 1921 were consulted (Baist 1921; Eaton 1887 and Stevenson 1884). Sanborn maps were available for the years 1888, 1894, 1906, 1950, and 1953 (Sanborn Map Company 1888, 1894, 1906, 1950, and 1953). Historical aerials were available for the years 1930, 1938, 1947, 1956, 1962, 1971, and 1986 (Aerial Map Industries 1986; Fairchild Aerial Surveys 1930, 1947, 1956, 1962; Laval Company Inc. 1938; Teledyne Geotronics 1971). Additionally, historic photos depicting the Project Site in the late nineteenth century were accessed via the University of Southern California's Digital Photo Collection (C.C. & Pierce Co. 1913 and Merriman Photo Art ca. 1900).

The 1884 map, prepared by a United States Surveyor H.J. Stevenson, shows that at this time the Project Site had belonged to Orzo W. Childs, though it had not yet been subdivided. A segment of the Zanja network is seen running east of the Project Site (Zanja No. 5) and one segment is seen running west of the Project Site (Zanja No. 8). The Fred Eaton 1887 map, depicting the proposed sewers of Los Angeles, shows the Project Site within a now subdivided

area. There is no reference to Zanja No. 5 or Zanja No. 8 on this map; however, the *Arroyo de los Reyes* is mapped running west of the Project Site. The *Arroyo de los Reyes* was a creek which originated north of what is now Echo Park, ran through a ravine, and then emerged near what is now Pershing Square.

The earliest Sanborn Map, from 1888, shows the block containing the Project Site developed as the “Residence and Ornamental Grounds” of Orzo W. Childs. The Project Site would have been in southeastern corner of the grounds and there does not appear to be any development in that area in 1888. The 1888 Sanborn map shows that development in the vicinity at this time consisted of a few domestic residences. In 1888 there appears to be a water pipe running down South Main Street, signified by two dashed lines running down the street. Additionally, the 1888 Sanborn shows that at this time, South Broadway had not been laid out and the block where the Project Site is located was approximately double its current size. Neither Zanja No. 5 nor Zanja No. 8 are depicted on the 1888 Sanborn. The 1894 Sanborn shows few changes to the block where the Project Site is located, though a few more small buildings appear to have been built along the western boundary of the block. The Project Site appears to still be devoid of any developments in 1894 and the nearby area is largely unchanged as well. In 1894, South Broadway had been partially laid out and meets South Main Street north of 11th Street. No references to Zanja No. 5 or Zanja No. 8 are made on the 1894 Sanborn. The water pipe present on the 1888 Sanborn is also present in 1894 and is designated as a 12 inch water pipe. The 1906 Sanborn shows that the block containing the Project Site had been redeveloped and was now home to Huntington Hall, a school for girls. The 1906 Sanborn shows that there were no buildings within the actual Project Site at this time. There are no significant changes to the nearby area visible on the 1906 Sanborn. Neither Zanja No. 5 nor Zanja No. 8 are mapped on the 1906 map, or any later maps showing the Project Site. A historic drawing from 1900 depicting the Project Site during the late nineteenth century shows the Child’s residence, which appeared to be a large mansion on carefully landscaped grounds. A later photo, from 1908 shows the Huntington Residence, which had been the Child’s Residence previously, in much the same state. Neither photo depict a Zanja or other such features running through the area. A real estate map prepared by G.W. Baist in 1921, shows that by this time South Broadway had been laid out in its current position and the block containing the Project Site had been subdivided. The majority of the block where the Project Site is located was not developed; however, there were three buildings within the Project Site, including two automobiles stores and two unnamed structures. Between 1906 and 1921 several new commercial developments had been built in the vicinity; though there were still many undeveloped lots and several single-family homes in the area.

Later Sanborn maps show a steady increase in development within the Project Site and vicinity. By 1950, there were several developments within the Project Site, including a private garage, an auto sales lot, several stores, and a clothing manufacturer. The nearby areas had experienced massive redevelopment between 1921 and 1950 as well and were home to various commercial enterprises with very few single family homes in the nearby vicinity. There are no changes between the 1950 Sanborn and the 1953 Sanborn.

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Historical aerials consulted dating from 1930 onwards indicate that the Project Site and vicinity were already heavily developed early in the twentieth century. The aerials from the 1930s show that by this time the Project Site was essentially completely developed. Overtime there were changes to the area resulting from redevelopment and in-fill projects. The Project Site appears to have been redeveloped between the 1960s and the 1970s, and by the late 1980s the Project Site was completely built out. Between 1986 and present, three buildings in the north of the Project Site were demolished and a parking lot was put in their place. No segments of Zanja No. 5 or Zanja No. 8 are visible on any historical aerials consulted. A thorough review of historic sources, including historical documents, academic research, maps, and aerials have not shown these Zanja segments to be located within or directly adjacent the Project Site. No cultural resources were identified within, or in the vicinity of, the Project Site through a CHRIS records search, SLF search, or archival research.

Because the presence or absence of archaeological materials cannot be determined until the Project Site is excavated, the Department of City Planning requires the following Regulatory Compliance Measure be implemented to ensure that if any archaeological resources are encountered during construction, impacts to such resources would remain less than significant. ***Therefore, compliance with the provisions of 14 CCR 15064.5(f) as set forth in RCM-CR-1 would ensure that the environmental impacts associated with the inadvertent discovery of significant archaeological resources would be reduced to a less than significant level.***

**RCM-CR-1 Archaeological.** In the event that cultural resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Proposed Project, all construction work occurring in the vicinity of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance and nature of the find under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing or data recovery may be warranted.

**c) Disturb any human remains, including those interred outside of formal cemeteries (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))?**

**Less Than Significant Impact.** A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains.

### ***Unanticipated Human Remains***

Based on the Archaeological Resource Assessment (see Appendix C), in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery (see Response to Comment RCM-

CR-2, below). No further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. ***Compliance with regulatory compliance measures would ensure that if any such remains are found during construction of the Proposed Project, they would be handled according to the proper regulations, and impacts to human remains would be less than significant.***

### **Regulatory Compliance Measure**

**RCM-CR-2 (Human Remains).** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:  
1104 N. Mission Road  
Los Angeles, CA 90033  
(323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or  
(323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

### **Cumulative Impacts**

**Less Than Significant Impact.** Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and

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revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with standard regulatory measures. For example, 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 PRC Section 5097.98. In the event that human remains are discovered during excavation activities, the City's grading regulations require the contractor to immediately stop working in the area of the find and contact the County Coroner. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. Depending upon the significance of any inadvertent discovery of archaeological resources, under CEQA (14 CCR 15064.5(f); PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. ***Therefore, the Proposed Project's incremental contribution to impacts upon archaeological resources would not be considerable, and cumulative impacts to cultural resources would be less than significant.***

# VI. Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Regulatory Setting

### *Federal*

#### *Corporate Average Fuel Economy Standard's*

Enacted by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standard's purpose is to reduce energy consumption by increasing the fuel economy of cars and light trucks. The CAFE standards are fleet-wide averages that must be achieved by each automaker for its car and truck fleet, each year, since 1978. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. CAFE standards are regulated by the United States Department of Transportation's (U.S. DOT) National Highway Traffic Safety Administration (NHTSA). The NHTSA sets standards to increase CAFE levels rapidly over the next several years, which will improve the nation's energy security and save consumer's money at the gas pump, while also reducing greenhouse gas (GHG) emissions. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Currently, the U.S. DOT and the U.S. Environmental Protection Agency (U.S. EPA) propose the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which would amend existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026. The NHTSA and the U.S. EPA are currently seeking comment on this proposal.<sup>19,20</sup>

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by U.S. EPA and NHTSA. The Phase 1 medium- and heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model

<sup>19</sup> U.S. DOT, *Corporate Average Fuel Economy (CAFE) Standards*, accessed May 2019.

<sup>20</sup> U.S. DOT, NHTSA, *Corporate Average Fuel Economy (CAFE), Laws and Regulations*, accessed July 2019.

## VI. Energy

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years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.<sup>21</sup> U.S. EPA and NHTSA have also adopted the Phase 2 medium- and heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.<sup>22</sup>

### *Energy Independence and Security Act*

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U.S. EPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”<sup>23</sup>

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<sup>21</sup> U.S. EPA, NHTSA, *Federal Register Volume 76, No. 179, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles, September 15, 2011.*

<sup>22</sup> U.S. EPA, NHTSA, *Federal Register Volume 81, No. 206, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles – Phase 2, October 25, 2016.*

<sup>23</sup> A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

**State**

*Clean Car Standards – Pavley, Assembly Bill 1493*

In 2002 the California State Legislature adopted and the Governor signed AB 1493 (Chapter 200, Statutes 2002, Pavley), in an effort to reduce greenhouse gas emissions in response to the increasing threat of climate change to the well-being of California’s citizens and the environment. AB 1493, directed the California Air Resources Board (CARB) to adopt the maximum feasible and cost-effective reductions in GHG emissions from light-duty vehicles. On September 24, 2009, CARB adopted amendments to the “Pavley” regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016 and later. It is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, while improving fuel efficiency and reducing motorists’ costs.<sup>24</sup>

*California Global Warming Solutions Act (AB 32)*

As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the state to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) with providing information, analysis, and recommendations to CARB regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. On July 2018, CARB announced that greenhouse gas pollution in California fell below 1990 levels, therefore achieving its 2020 greenhouse gas emissions goal set by AB 32.<sup>25</sup>

*California Renewables Portfolio Standard*

The California Renewables Portfolio Standard (RPS) program, which was established in 2002 by Senate Bill (SB) 1078, required that 20 percent of the available energy supplies in California come from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20-percent mandate to 2010. These mandates apply directly to investor-owned utilities. In 2011, California Governor Jerry Brown signed into law Senate Bill 2X, which modified California’s RPS program to require that both publicly- and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. In October 2015, Governor Brown signed into legislation Senate Bill 350 (SB 350), which requires retail sellers and publicly-owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. In 2018, Senate Bill 100 (SB 100) was signed into law, which again increases the RPS to

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<sup>24</sup> CARB, *Clean Car Standards – Pavley, Assembly Bill 1493*, accessed April 2019.

<sup>25</sup> CARB, “*Climate Pollutants Fall Below 1990 Levels for First Time*”, website: <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time> accessed May 2019.



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60 percent by 2030 and requires all of California's electricity to come from carbon-free resources by 2045. SB 100 became effective on January 1, 2019.<sup>26</sup>

### *In-Use Off-Road Diesel Fueled Fleets Regulation*

Since off-road vehicles that are used in construction and other related industries can last 30 years or longer, most of those that are in service today are still part of an older fleet that do not have emission controls. In 2007, CARB approved the "In-Use Off-Road Diesel Fueled Fleets Regulation" to reduce emissions from existing (in-use) off-road diesel vehicles that are used in construction and other industries. This regulation sets an anti-idling limit of five minutes for all off-road vehicles 25 horsepower and up. It also establishes emission rates targets for the off-road vehicles that decline over time to accelerate turnover to newer, cleaner engines and require exhaust retrofits to meet these targets. Revised in October 2016, the regulation enforced off-road restrictions on fleets adding vehicles with older tier engines, and started enforcing beginning July 1, 2014. By each annual compliance deadline, a fleet must demonstrate that it has either met the fleet average target for that year, or has completed the Best Available Control Technology requirements (BACT). Large fleets have compliance deadlines each year from 2014 through 2023, medium fleets each year from 2017 through 2023, and small fleets each year from 2019 through 2028. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation could potentially result in an increase in energy savings in the form of reduced fuel consumption from more fuel efficient engines.<sup>27</sup>

### *California Air Resources Board*

#### *Advanced Clean Cars Program*

The Advanced Clean Cars Program was approved by CARB in 2012. It represents a new approach by controlling emissions from passenger vehicles. The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot, and GHG emissions. Components of this program are the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs, with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. The number of plug-in hybrid cars and zero-emission vehicles on California's roads and highways will increase and fuels, such as electricity and hydrogen, will be readily available for these new vehicle technologies.<sup>28</sup> In particular,

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<sup>26</sup> California Public Utilities Commission, *California Renewables Portfolio Standard*, website: <https://www.cpuc.ca.gov/rps/>, accessed March 2020.

<sup>27</sup> Office of Energy Efficiency & Renewable Energy, *Energy Efficiency*, website: <https://www.energy.gov/eere/vehicles/fuel-efficiency>, accessed May 2020.

<sup>28</sup> California Air Resources Board, *Advanced Clean Cars Program*, website: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about>, accessed March 2020.

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implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered.

### *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling*

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

### *Senate Bill 1389*

Senate Bill 1389 (SB 1389) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC shall use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety. The CEC adopts a new or updated Integrated Energy Policy Report (IEPR) every two years. The most recent IEPR was released in early 2020 and addressed a variety of issues, including, but not limited to, implementation of SB 350, electricity resource/supply plans, electricity and natural gas demand forecast, natural gas outlook, transportation energy demand forecasts, doubling energy efficiency savings, integrated resource planning, climate adaptation and resiliency, renewable gas, Southern California energy reliability, distributed energy resources, strategic transmission investment plan, and existing power plant reliability issues.<sup>29</sup>

### *Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations) (Title 24 Standards) were established in 1978 in response to a legislative mandate to reduce California's energy consumption to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The standards are updated periodically (typically every three years) to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2019 Standards went into effect on January 1, 2020, and improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 update to the Energy Efficiency Standards for Residential and

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<sup>29</sup> CEC, *Final 2020 Integrated Energy Policy Report*, accessed June 2021.

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Nonresidential Buildings focuses on several key areas to improve the energy efficiency of new constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards. The 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. Furthermore, the 2019 update requires that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.<sup>30</sup>

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to “improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”<sup>31</sup> The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. As previously mentioned, the 2019 update to the CALGreen Code went into effect on January 1, 2020. The 2019 CALGreen Code improves upon the previously applicable 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation.

### **Regional**

#### *Southern California Association of Governments 2020-2045 RTP/SCS*

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG’s Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region’s first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks and between planning strategies. The most recently adopted 2020-2045 RTP/SCS, referred to as the Connect SoCal Plan, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

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<sup>30</sup> California Energy Commission, 2019 Building Energy Efficiency Standards, December 2018, [https://www2.energy.ca.gov/publications/displayOneReport\\_cms.php?pubNum=CEC-400-2018-020-CMF](https://www2.energy.ca.gov/publications/displayOneReport_cms.php?pubNum=CEC-400-2018-020-CMF), accessed June 2021.

<sup>31</sup> California Building Standards Commission, 2010 California Green Building Standards Code, (2010).

**Local**

*The Green New Deal Sustainable City pLAn 2019*

In 2015, Mayor Eric Garcetti released the City's first Sustainable City pLAn (Sustainable City pLAn) through Executive Directive No. 7. In 2019, the Mayor's office adopted The Green New Deal Sustainable City pLAn 2019 (L.A.'s Green New Deal) as an update to the 2015 Sustainable City pLAn. L.A.'s Green New Deal establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation and sets the following targets for a sustainable city:

- Supply 55 percent renewable energy by 2025; 80 percent by 2036; and 100 percent by 2045;
- Source 70 percent of our water locally by 2035, and capture 150,000 acre ft/yr (AFY) of stormwater by 2035;
- Reduce building energy use per square foot for all types of buildings 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050;
- Reduce Vehicle Miles Traveled per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050;
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035;
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035, and 100 percent by 2050;
- Increase the percentage of zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050;
- Create 300,000 green jobs by 2035; and 400,000 by 2050;
- Convert all city fleet vehicles to zero emission where technically feasible by 2028;
- Reduce municipal GHG emissions 55 percent by 2025 and 65 percent by 2035 from 2008 baseline levels, reaching carbon neutral by 2045.

*City of Los Angeles Green Building Code*

In 2010, the City adopted the 2010 CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new "L.A. Green Building Code," applicable to new development projects. As amended by Ordinance 186,488 in 2019, the L.A. Green Code incorporates by reference portions of the 2019 Edition of the CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. Chapter IX, Article 9, Division 5 includes mandatory measures for newly constructed non-residential and high-rise residential buildings. The L.A. Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Specific measures in the L.A. Green

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Building Code intended to improve building energy efficiency and conserve energy are included as LAMC Sections 99.04.201 through 99.04.505 for residential mandatory measures and as LAMC Sections 99.05.201 through 99.05.504 for non-residential mandatory measures. These energy efficiency measures include renewable energy, indoor and outdoor water uses, water reuse systems, waste reduction, pollutant control, and interior moisture control measures.

### *2017 Final Power Strategic Long-Term Resource Plan (SLTRP)*

In April 2018, the Los Angeles Department of Water and Power (LADWP) approved the Power Strategic Long-Term Resource Plan (SLTRP), which increases LADWP's planning horizon, from 20 years ending in 2037 and extending through 2050, in order to better align with Statewide GHG emissions goals and align with Los Angeles' 100 percent clean energy initiative, detailed in the City's Los Angeles Green New Deal. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and power system assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.

The 2017 Power SLTRP outlines an aggressive strategy for LADWP to accomplish its goals, comply with regulatory mandates under the State's RPS regulations, and provide sufficient resources over the next 20 years. The 2017 Power SLTRP incorporates the Enforcement Procedures for the RPS for Local Publicly Owned Electric Utilities pursuant to Section 399.30(l) of the California Renewable Energy Resources Act (SB 2 [1X]) and identifies optional compliance measures found in the Regulations. The 2017 Power SLTRP identifies a combination of GHG reduction strategies, including early coal replacement two years ahead of schedule by 2025; accelerating LADWP's RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability; accelerating electric transportation to absorb GHG emissions from the transportation sector; and investing in the Power System Reliability Program to maintain a robust and reliable power system. Thus, the 2017 Power SLTRP would achieve and exceed mandates established in previous RPS. In order to achieve a 100 percent clean energy portfolio, these strategies listed in the 2017 Power SLTRP are provided for LADWP to incorporate in order to reach the City's overall 100 percent clean energy initiative, as part of the City's Green New Deal.

With respect to the status of LADWP's RPS portfolio, LADWP achieved the state legislated goal of 32 percent of all energy sources coming from renewable energy in 2019.<sup>32</sup>

### *City of Los Angeles Solid Waste Integrated Resources Plan*

Under the City's Solid Waste Integrated Resources Plan (SWIRP), the City committed to reaching Zero Waste by diverting 70 percent of the solid waste generated in the City by 2013,

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<sup>32</sup> California Energy Commission, *Utility Annual Content Labels for Los Angeles Department of Water and Power, 2019*.

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diverting 90 percent by 2025, and becoming a zero waste city by 2030.<sup>33</sup> Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that would aid the City in meeting its diversion goals by, among other things: (i) requiring franchises to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which would enable required reporting and monitoring of state mandated commercial and multifamily recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards. As reported by the Bureau of Sanitation, the City reached 72 percent diversion rate in 2010, the base year for SWIRP. By 2011, the City achieved 76.4 percent diversion rate.<sup>34</sup>

### Existing Conditions

#### *Electricity*

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, for distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

The LADWP power system serves approximately 4 million people and is the nation's largest municipal utility. Its service territory covers the City of Los Angeles and many areas of the Owens Valley, with annual sales exceeding 26 million megawatt-hours (MWh). LADWP is a "vertically integrated" utility, both owning and operating the majority of its generation, transmission and distribution systems. LADWP strives to be self-sufficient in providing electricity to its customers and does so by maintaining generation resources that are equal to or greater than its customers' electrical needs.

LADWP obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. LADWP obtains power from four municipally-owned power plants within the Los Angeles Basin, LADWP Hydrogenerators on the Los Angeles Aqueduct, shared-ownership generating facilities in the Southwest, and also purchases power from the Southwest and Pacific Northwest. LADWP also purchases excess

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<sup>33</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013.*

<sup>34</sup> *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013 (at page 46).*

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power, as it is made available, from self-generators interconnected with the LADWP within the City.

According to LADWP's 2017 Power SLTRP, LADWP has a net dependable generation capacity greater than 7,531 MW.<sup>35</sup> On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,432 MW.<sup>36</sup> In 2018, approximately 32 percent of LADWP's 2018 electricity mix was from renewable sources, which is similar to the 31 percent statewide percentage of electricity purchases from renewable sources.<sup>37</sup> The annual electricity sale to customers for the 2016-2017 fiscal year was approximately 22,878 million GWh.<sup>38</sup>

The LADWP currently provides electricity to the Project area with all required infrastructure present. The Project Site is developed with approximately 26,710 square feet of retail commercial land uses. It is estimated that existing uses on the Project Site currently consumes approximately 361,921 kWh of electricity per year.

### **Natural Gas**

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of cubic feet (cf).

The Southern California Gas Company (SoCalGas), a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City through existing gas mains located under the streets. Natural gas service is provided in accordance with the SoCalGas' policies and extension rules on file with the CPUC at the time contractual agreements are made. The availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas service would be provided in accordance with those revised conditions.

SoCalGas, along with five other California utility providers released the 2020 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2035. This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for

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<sup>35</sup> Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), December 2017, at p. 17.

<sup>36</sup> Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), Power Facts & Figures, pg. ES-1, December 2017.

<sup>37</sup> California Energy Commission, Utility Annual Content Labels for Los Angeles Department of Water and Power, 2018.

<sup>38</sup> Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), Appendix A, Load Forecasting, pg. A-6, December 2017.

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hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.<sup>39</sup>

In 2019, gas supplies available to SoCalGas from California sources averaged 97 million cubic feet per day (cf/day).<sup>40</sup> Based on the 2020 California Gas Report, SoCalGas projects total natural gas demand to decrease at an annual rate of 1 percent per year from 2020 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI).<sup>41</sup> Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' projection for natural gas also decreases. Under an average-temperature condition and a normal hydro year, gas demand for the State is projected to average 5,205 million cubic feet of gas per day (MMcf/d) in 2020. Based on the 2020 California Gas Report (Table 34), the CEC estimates natural gas consumption within the SoCalGas' planning area will be approximately 2,317 million cf/day in 2026 (the Proposed Project's buildout year) with a total capacity of approximately 3,435 million cf/day, allowing for a remaining capacity of approximately 1,118 million cf/day.

As noted above, the Project Site is developed with approximately 26,710 square feet of retail commercial land uses. It is estimated that existing uses on the Project Site currently consumes approximately 77,459 cf per month or approximately 2,582 cf per day.

### ***Transportation Energy***

Different types of energy sources, or fuels, are used for transportation in the U.S., which include petroleum products (e.g., gasoline, diesel, jet fuel, residual fuel oil, and propane), biofuels (e.g., ethanol and biodiesel), natural gas, and electricity. Petroleum-based fuels account for about 90 percent of California's transportation energy sources. Gasoline remains the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. The transportation sector generates the most GHG emissions and uses the most energy in California. In recognition of these challenges, California has been enacting policies and goals to shift the transportation sectors toward cleaner, sustainable fuels and more efficient technology vehicles.

Though California's population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.6 billion gallons in 2017 to between 12.1 billion and 12.6 billion gallons in 2030, a 19-percent to 22-percent reduction. This decline comes in response to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles. The

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<sup>39</sup> *California Gas and Electric Utilities, 2020 California Gas Report, accessed June 2021.*

<sup>40</sup> *Ibid.*

<sup>41</sup> *AMI is linked to the Advanced Meter Project. The Advanced Meter Project upgrades existing natural gas meters with a wireless communication device, which will automatically read and transmit hourly gas usage information through a two-way communication network to customer and billing center. The Advanced Meter Project provides customers with more frequent and detailed natural gas use information to help identify ways to better control costs and manage usage.*



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CEC projects that the amount of alternative fuel (e.g., electricity, natural gas, hydrogen, ethanol) consumed within the transportation sector will increase in the future.<sup>42</sup>

Currently, the Project Site is developed with approximately 26,710 square feet of retail commercial land uses. It is estimated that the trips associated with the operation of the existing commercial uses on-site consume a total of approximately 149,856 gallons of gasoline per year.<sup>43</sup>

### PROJECT-SPECIFIC IMPACTS

**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 provides a discussion of six criteria contained in Appendix F of the CEQA Statute and guidelines to help determine whether the Proposed Project would result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

*Criteria 1) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

#### **Construction Impacts**

Energy would be consumed during the construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of soil, asphalt, and building debris from the Project Site during the demolition/site clearing phase. The demolition phase of the Proposed Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the demolition, site clearing, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. In addition to diesel fuel and vehicular fuel, an unquantifiable amount of electricity and natural gas would be consumed as a result of the temporary construction process. Construction equipment and activities do not generally involve the use of natural gas.

About 19.6 pounds of CO<sub>2</sub> are produced from burning a gallon of gasoline that does not contain fuel ethanol. Most of the retail gasoline now sold in the United States (more than 95 percent) contains about 10 percent fuel ethanol by volume. A motor gasoline blend of 10 percent fuel ethanol and 90 percent gasoline (by volume) is known as E10 gasoline. Based on carbon

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<sup>42</sup> CEC, *Revised Transportation Energy Demand Forecast, 2018-2030, February 2018.*

<sup>43</sup> Refer to *Fuel Consumption Calculations included as Appendix D in this SCEA.*

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dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration (EIA), the amount of diesel and petroleum-based gasoline (E10) consumed can be estimated based on CO<sub>2</sub> emissions. Burning one gallon of diesel fuel generates approximately 22.4 pounds of CO<sub>2</sub>, and burning one gallon of petroleum-based gasoline with 10 percent ethanol content (E10) produces approximately 18.9 pounds of CO<sub>2</sub> emissions.<sup>44,45</sup> Based on the U.S. EIA fuel consumption factors identified above, and the Proposed Project's estimated "Total CO<sub>2</sub>" emissions presented in Appendix A of this SCEA, Air Quality Modeling Worksheets, it is estimated that the construction of the Proposed Project would consume a total of approximately 229,158 gallons of fuel, including approximately 119,181 gallons of diesel fuel and 109,976 gallons of gasoline.<sup>46</sup>

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 for projects of this size and would not necessitate additional energy facilities or distribution infrastructure. **Accordingly, energy demands during construction would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.**

### **Operational Impacts**

#### *Electricity*

As shown in Table 6.6, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,849,874 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed 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. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's 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 Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.

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<sup>44</sup> U.S. Energy Information Administration, website: <http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11>, accessed December 2018.

<sup>45</sup> U.S. Energy Information Administration, website: <http://www.eia.gov/tools/faqs/faq.cfm?id=307&t=11>, accessed December 2018.

<sup>46</sup> Refer to Fuel Consumption Calculations included as Appendix D in this SCEA.

**Table 6.6**  
**Estimated Electricity Consumption by the Proposed Project**

Land Use	Size	Generation Rate <sup>a</sup>	Unit	Total (kilowatt hours/year)
<b>Existing Uses (to be removed)</b>				
Retail	26,710 sf <sup>b</sup>	13.55	kWh/sf/year	361,921
<b>Total Existing Electricity Consumption:</b>				<b>361,921</b>
<b>Proposed Project</b>				
Residential Uses	363 du	5,626.5	kWh/unit/year	2,042,420
Commercial	12,500 sf	13.55	kWh/sf/year	169,375
<b>Proposed Project Total Electricity Consumption:</b>				<b>2,211,795</b>
<b>Less Existing Electricity Consumption:</b>				<b>-361,921</b>
<b>Net Electricity Consumption:</b>				<b>1,849,874</b>
<i>Notes:</i>				
<i>du: dwelling unit; sf: square feet; kWh = kilowatt-hour</i>				
<sup>a</sup> SCAQMD CEQA Air Quality Handbook, 1993.				
<sup>b</sup> The Project Site is developed with 28,110 square feet of retail space. However, at the time of analysis only 26,710 square feet of retail space was occupied, and the remainder of the Project Site was vacant. Thus, for purposes of estimating the baseline energy use, the existing electricity use was based on the occupied floor area to provide a more conservative estimate of the Project's net electricity demand.				
Source: Parker Environmental Consultants, 2019.				

The Proposed Project would include energy conservation features. Specifically, the residential units 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 (see Regulatory Compliance Measures RCM-GHG-1 through RCM-GHG-5 in Section 6.VIII, Greenhouse Gas Emissions of this SCEA). Thus, the Proposed Project's 363 residential units would incorporate energy conservation features.

#### *Natural Gas*

As mentioned previously, based on the 2020 California Gas Report (Table 34), the CEC estimates natural gas consumption within the SoCalGas' planning area will be approximately 2,317 million cf/day in 2026 (the Proposed Project's buildout year) with a total capacity of approximately 3,435 million cf/day, allowing for a remaining capacity of approximately 1,118 million cf/day. As shown in Table 6.7, below, the natural gas consumption as a result of the operation of the Proposed Project, approximately 1,414,966 cubic feet per month, would represent a very small fraction of one percent of the SoCalGas' existing natural gas storage capacity and therefore, would be within the SoCalGas' existing natural gas storage capacity of approximately 1,118 million cubic feet as of 2020.

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green*

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*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 Proposed Project’s demand on natural gas consumption.

**Table 6.7  
Estimated Natural Gas Consumption by the Proposed Project**

Land Use	Size	Generation Rate <sup>a</sup>	Unit	Total (cubic feet/month)
<b>Existing Conditions (to be removed)</b>				
Retail	26,710 sf <sup>b</sup>	2.9	cf/sf/month	77,459
<b>Total Existing Natural Gas Consumption:</b>				<b>77,459</b>
<b>Proposed Project</b>				
Residential Uses	363 du	4,011.5	cf/unit/month	1,456,175
Commercial	12,500 sf	2.9	cf/sf/month	36,250
<b>Proposed Project Total Natural Gas Consumption:</b>				<b>1,492,425</b>
<b>Less Existing Natural Gas Consumption</b>				<b>-77,459</b>
<b>Total Net Increase in Natural Gas Consumption</b>				<b>1,414,966</b>
<i>Notes:</i>				
<i>du: dwelling unit; sf: square feet</i>				
<sup>a</sup> SCAQMD CEQA Air Quality Handbook, 1993.				
<sup>b</sup> The Project Site is developed with 28,110 square feet of retail space. However, at the time of analysis only 26,710 square feet of retail space was occupied, and the remainder of the Project Site was vacant. Thus, for purposes of estimating the baseline energy use, the existing natural gas consumption was based on the occupied floor area to provide a more conservative estimate of the Project’s net natural gas demand.				
Source: Parker Environmental Consultants, 2019.				

*Fossil Fuels*

Approximately 147,477 gallons of gasoline fuel would be utilized by mobile sources annually during operation of the Proposed Project.<sup>47</sup> However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas, and oil. The Project Site is located in the Central City area, which is highly connected to the regional transit network in the Los Angeles area, especially the Downtown Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including nearby railways, are also present. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT DASH and Commuter Express, Santa Monica Big Blue Bus (BBB), and the City of Gardena (GTrans). Specifically, a total of 13 bus lines serve the Project Site, including Metro Local lines 18, 53, 60, 62, 66, 106, The bus lines within a “reasonable walking distance” (approximately one-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78,

<sup>47</sup> Refer to Fuel Consumption Calculations included as Appendix D in this SCEA.

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79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11<sup>th</sup> Street. Additionally, while some bus lines and/or other transit services in the general Project vicinity are considered to be too distant from the Project Site (generally, more than one-quarter mile) to be used directly, these services can be accessed via connections to or transfers from the site-serving lines to provide access for Project residents, visitors, employees, and patrons between the Project Site and the larger regional area. Due to its proximity to the bus lines aforementioned, the Project Site is easily accessible and highly connected with the City and the greater Los Angeles area.

Additionally, as an infill development, Proposed Project would incorporate a mix of residential and commercial uses that may include retail, restaurant, and other neighborhood serving commercial. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. Because the commercial component of the Proposed Project would be primarily serving to the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Proposed Project or the surrounding area. The reduction in vehicle trips, due to the Proposed Project's mixed-use programming and the Project Site's location in a transit-oriented district, would therefore decrease the Proposed Project's reliance on fossil fuels. Additionally, as discussed in Section XVII, Transportation, the Proposed Project is expected to have a less-than-significant VMT impact based on the residential component. Since the Proposed Project's retail component would not exceed 50,000 square feet, the retail component was determined not to have a significant VMT impact and the work VMT per employee was not calculated for the Proposed Project as per LADOT's Traffic Assessment Guidelines. Therefore, the Proposed Project is not anticipated to result in a significant increase in VMT. As such, the energy requirements and energy use of the Proposed Project as related to petroleum-based fuels during operation would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant. **Accordingly, energy demands during operation would be less than significant.**

*Criteria 2) The effects of the Project on local and regional energy supplies and on requirements for additional capacity.*

### *Electricity*

Construction of the Proposed Project would generate a demand for the treatment and conveyance of water for dust suppression activities during the excavation and grading phase. The electricity demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure. Furthermore, the electricity demand during construction would be offset with the removal of the existing on-site uses which currently generate a demand for electricity.

With respect to operational electricity demand, correspondence with LADWP (See Appendix H) states that electric service is available to serve the Proposed Project and would be provided in accordance with LADWP's Rules Governing Water and Electric Service. The availability of

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electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Proposed Project would be 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. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power Strategic Long-Term Resource Plan incorporates the estimated power requirement for the Proposed Project through the load forecast input and has planned sufficient resources to supply the electricity needs.<sup>48</sup> Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Proposed Project's buildout year) would be 23,807 GWh of electricity. As such, the Proposed Project's estimated annual usage of 1,849,874 kWh/year would represent 0.008 percent of LADWP's projected sales for 2026. Furthermore, LADWP confirmed the Proposed Project's electricity demand can be served by the existing facilities in the Project Site area by specifically indicating "[t]he estimated power requirement for this proposed project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system."<sup>49</sup>

Therefore, the Proposed Project would not result in an increase in demand for electricity that exceeds available supply, and construction and operations of the Proposed Project would thus not affect local or regional electricity supplies or requirements for additional capacity and impacts would be less than significant.

### *Natural Gas*

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction, resulting in a net decrease when compared to existing operations.

With respect to operations, SoCalGas manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g., pressure betterments, natural gas supplies) would need to be initiated to solve problems. It is anticipated that the SoCalGas would be able to meet the natural gas demands of the Proposed Project. However, consistent with standard practice, a detailed natural gas survey of equipment would be completed prior to construction to ensure that the current infrastructure can adequately sustain the demand for the Proposed Project. Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Proposed Project would not require extensive infrastructure improvements to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Proposed Project. The Proposed Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. "Hooking-up"

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<sup>48</sup> LADWP, *2017 Power Strategic Long-Term Resource Plan, Page ES-25 – ES-26, December 31, 2017.*

<sup>49</sup> *Los Angeles Department of Water and Power, Will Serve letter from Charles Holloway, dated June 6, 2019. See Appendix H.*

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disruptions along sidewalks or streets cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature.

As estimated above, the Proposed Project's net natural gas demands are estimated to be approximately 1,414,966 cubic feet per month or 47,166 cf per day. As mentioned previously, the CEC estimates natural gas consumption within the SoCalGas' planning area will be approximately 2,317 million cf/day in 2026 (the Proposed Project's buildout year) with a total capacity of approximately 3,435 million cf/day, allowing for a remaining capacity of approximately 1,118 million cf/day. The Proposed Project's increased demand for natural gas would represent 0.004 percent of SoCalGas' forecasted natural gas consumption for 2026, and would also be well within the SoCalGas' estimated natural gas storage capacity of 1,118 million cubic feet as in 2026. Therefore, the Proposed Project would not adversely affect local and regional natural gas supplies or generate a demand for additional capacity during construction or operation. Impacts would be less than significant.

### *Transportation Energy*

In 2020, approximately 485,454 thousand barrels of crude oil (approximately 20.4 billion gallons) were supplied to California refineries.<sup>50</sup> Based on the CEC's Retail Fuel Outlet Annual Reporting Results, approximately 3.56 billion gallons of gasoline fuel and 0.28 billion gallons of diesel fuel was sold in Los Angeles County in 2019.<sup>51</sup>

In order to quantify the amount of diesel and gasoline fuel utilized for the Proposed Project's construction, the total CO<sub>2</sub> emissions from each of the construction phases and activities calculated in the CalEEMod worksheets for the Proposed Project were utilized to estimate the gallons of diesel and gasoline consumed (Appendix D, Energy Conservation Worksheets). The Proposed Project would consume approximately 229,158 gallons of transportation fuel, including 119,181 gallons of diesel and 109,977 gallons of gasoline during construction. 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, the effects of the Proposed Project on local and regional energy supplies and on requirements for additional capacity would not be significant.

Assuming the same supply of crude oil is provided to California and Los Angeles County in 2026 (buildout year of Proposed Project), the Proposed Project's estimated net increase in operational demand for 147,477 of gasoline per year estimated, would represent approximately 0.004 percent of estimated 3.56 billion gallons of gasoline fuel sales for the Los Angeles County. This estimate is conservative since it is assumed that California's reliance on oil would

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<sup>50</sup> California Energy Commission, *Oil Supply Sources to California Refineries*, website: [http://www.energy.ca.gov/almanac/petroleum\\_data/statistics/crude\\_oil\\_receipts.html](http://www.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html), accessed June 2021.

<sup>51</sup> California Energy Commission, *California Retail Fuel Outlet Annual Reporting Results*, website: <https://www.energy.ca.gov/media/3874>, accessed June 2021.

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be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles. As such, the gasoline consumption associated with the Proposed Project's vehicle trips during both construction and operation would be a negligible amount of oil compared to the total amount of oil supplied to California and sold in the Los Angeles County, and impacts on regional and local supplies would be less than significant.

*Criteria 3) The effects of the Project on peak and base period demands for electricity and other forms of energy.*

As discussed above, the electricity demand, natural gas consumption, and transportation energy consumption would be well within the available regional supplies and overall capacity of LADWP, SoCalGas, and California refineries, respectively. The Proposed Project's energy demand and consumption are negligible compared to available supplies during both construction and operation.

With regard to peak electricity load conditions, the 2017 Power SLTRP stated the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.<sup>52</sup> LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2026-2027 (closest forecasted year to first project operational year), the base case peak demand for the power grid is 6,129 MW. Under peak conditions, the Proposed Project would consume approximately 2,211,795 kWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to approximately 505 kW (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid base peak load of 6,129 MW for 2026-2027, based on the assumption above, the Proposed Project would represent approximately 0.008 percent of the LADWP base peak load conditions. Therefore, Proposed Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

With regard to peak day natural gas demand, the 2020 California Gas Report estimates for 2026 (Proposed Project first operational year), the extreme peak demand for the SoCalGas service area is 2,782 million cf/day. Under average conditions, the Proposed Project would consume approximately 1,492,425 cf/month. As a conservative estimate for estimating peak demand, it is assumed the yearly natural gas usage only occurs during three months (90 days) of the year, during the winter months. This results in a monthly peak natural gas usage of 5,969,700 cf per month or approximately 66,330 cf per day (conservatively assuming natural gas usage would only occur during the winter months). In comparison to the CEC extreme peak day demand of 2,782 million cf for 2026, based on the assumption above, the Proposed Project would represent 0.002 percent of SoCalGas' forecasted extreme peak day demand. Therefore, Proposed Project natural gas demand during operational activities would have a negligible effect on peak demands of the natural gas supplies.

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<sup>52</sup> LADWP, 2017 Retail Electric Sales and Demand Forecast, September 15, 2017.



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The electricity, and natural gas energy supplies would be sufficient to serve the Proposed Project's peak energy demand. Thus, the Proposed Project's electricity and natural gas demand during operational activities would have a negligible effect on demand during peak and base load periods of the power grid and on the natural gas supplies, and impacts would be less than significant.

*Criteria 4) The degree to which the Project complies with existing energy standards.*

### *Construction*

During construction, trucks and equipment operated on-site would comply with SCAQMD's anti-idling regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets regulation. Compliance with the anti-idling and diesel-fueled fleet regulations would directly reduce the amount of diesel fuel consumed during the construction phase. Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act, which mandates standards for electrical motors and equipment. Therefore, the Proposed Project's construction activities would comply with existing energy standards, and impacts would be less than significant.

### *Operation*

The Proposed Project would be required to comply with 2019 Title 24 requirements, 2019 CalGreen requirements, and the L.A. Green Building Code. Therefore, the Proposed Project would comply with energy standards with respect to electricity and natural gas usage. With respect to transportation energy, it should be noted that the fuel use for vehicle transportation is conservatively based on an estimate of the Project's total annual VMTs and current fuel use estimated in mpg for gasoline and diesel. Future fuel use in the region would actually be lower as a result of CAFE standards and CARB's Advanced Clean Cars Program, which would further increase fuel economy and reduce demands for transportation fuel. Therefore, the Proposed Project would comply with all existing construction and operational energy standards that are applicable to the Proposed Project, and impacts would be less than significant.

*Criteria 5) The effects of the Project on energy resources.*

### *Electricity Resources*

As previously described, LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Construction of the Proposed Project would generate a temporary demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase. However, it is anticipated that electricity demands during construction would be well below the existing electricity demands of the current uses on the Project Site, and construction activities would not necessitate additional energy facilities or distribution infrastructure.

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Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2026-2027 fiscal year (the Proposed Project's buildout year) would be 23,807 GWh of electricity. As such, the Proposed Project's estimated operational annual net increase in electricity demand (approximately 2,211,795 kWh/year) would represent approximately 0.009 percent of LADWP's projected sales for 2026-2027. In accordance with SB 350, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. LADWP has increased its renewable energy percentage from 3 percent in 2003 to 32 percent in 2018. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead. The Proposed Project would adhere to the required building code standards, such as 2019 Title 24 standards and 2020 L.A. Green Building Code, to ensure energy efficiency within the proposed structures. Compliance with energy standards are expected to result in more efficient use of electricity in future years. The LADWP's 2017 Power SLTRP identifies adequate resources (renewables, natural gas, coal) that are consistent with the RPS mandates to support future generation capacity. As such, the Proposed Project would not impact electricity resources during either construction or operation, and impacts would be less than significant. Due to the Project Site's location, other types of on-site renewable energy sources would not be feasible on-site as there are no local sources of energy from the following sources: biodiesel, biomass, hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, methane, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Therefore, the Proposed Project would not affect electrical resources during operation or construction, and impacts would be less than significant.

### *Natural Gas Resources*

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. As stated in the 2020 California Gas Report, the CEC estimates average natural gas consumption within the SoCalGas' planning area will be approximately 2,317 million cf/day in 2026 (the Proposed Project's buildout year). Construction activities for the Proposed Project, including the construction of new buildings and facilities, would not involve the consumption of natural gas. The Proposed Project's natural gas demands during Project operation are estimated to be approximately 1,492,425 cf/month or approximately 47,758 cf/day. The net increase in natural gas demand generated by the Proposed Project would represent 0.0002 percent of the SoCalGas' estimated daily consumption of 2,317 million cf/day and, therefore, would be well within SoCalGas' forecasted natural gas supply for the year 2026. Compliance with energy standards are expected to result in more efficient use of natural gas in future years. Therefore, the Proposed Project would not affect natural gas resources during operation or construction, and impacts would be less than significant.

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### *Transportation Energy Resources*

As mentioned previously, approximately 485,454 thousand barrels of crude oil (approximately 20.4 billion gallons) were supplied to California refineries in 2020.<sup>53</sup> At a local level, approximately 3.56 billion gallons of gasoline fuel and 0.28 billion gallons of diesel fuel was sold in the Los Angeles County in 2019.<sup>54</sup> 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. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels.

Assuming the same supply of crude oil is provided to California, the Proposed Project's net increase in estimated annual consumption of approximately 147,477 of gasoline per year estimated, would represent approximately 0.004 percent of estimated 3.56 billion gallons of gasoline fuel sales for the Los Angeles County region. This estimate is conservative since it is based on current fuel efficiency standards for diesel and gasoline engines. California's future reliance on transportation fuel would be further reduced in future years since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles under CAFE standards and CARB's Advanced Clean Cars Program. As such, the Proposed Project's transportation energy consumption during construction and operation would not substantially affect California's petroleum based transportation fuel supplies or Los Angeles County's fuel sales, and impacts would be less than significant.

*Criteria 6) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

As discussed in the Section XVII. Transportation, of this SCEA, the Proposed Project would promote trip reductions and alternative modes of transportation. The Project Site is located within a HQT, as defined by the SCAG. The Proposed Project's mix of residential and commercial/retail uses, close proximity to numerous transit options, and location near a broad mix of existing land uses would result in a net reduction in daily trips and VMT. The Proposed Project would provide 195 bicycle parking spaces to encourage residents, patrons, and employees to utilize alternate modes of transportation, such as walking, biking, and public transportation. As such, the Proposed Project would promote alternate modes of transportation and reduce its reliance on transportation energy and impacts would be less than significant.

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<sup>53</sup> California Energy Commission, *Oil Supply Sources to California Refineries*, website: [http://www.energy.ca.gov/almanac/petroleum\\_data/statistics/crude\\_oil\\_receipts.html](http://www.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html), accessed June 2021.

<sup>54</sup> California Energy Commission, *California Retail Fuel Outlet Annual Reporting Results*, website: <https://www.energy.ca.gov/media/3874>, accessed June 2021.

***As demonstrated in the analysis of the six criteria discussed above, the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Proposed Project's demands on electricity, natural gas, and transportation energy would not significantly affect local and regional supplies or capacity. The Proposed Project's energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. Additionally, the Proposed Project would comply with all energy conservation standards applicable to the Proposed Project. In summary, the Proposed Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, the Proposed Project would not cause wasteful, inefficient, and unnecessary consumption of energy during the construction and operation, and impacts with respect to energy consumption would be less than significant.***

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact.** Appendix F: Energy Conservation of the State CEQA Guidelines states the goal of conserving energy implies the wise and efficient use of energy. The State CEQA Guidelines outlines three means to achieve this goal: (1) Decreasing overall per capita energy consumption, (2) Decreasing reliance on fossil fuels such as coal, natural gas and oil, and (3) Increasing reliance on renewable energy sources. The determination of whether a project results in a significant impact on energy conservation shall be made considering the following factors: a) the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; b) whether and when the needed infrastructure was anticipated by adopted plans; and c) the degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

The Proposed Project would develop one mixed-use building on an infill site, which would contribute to the revitalization of the Central City Community Plan area. As a mixed-use project, with residential, and commercial land uses, the Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards for Residential and Nonresidential Buildings located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Standards will continue to improve upon the 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The

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effective date of the 2019 Standards is January 1, 2020.<sup>55</sup> The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

### **Renewable Energy**

The LADWP's 2016 Power Integrated Resource Plan (IRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost-effective manner. The 2016 IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Starting in 2017, the City's Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmental responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands would primarily be derived from renewable energy sources.

On a project specific level, the Proposed Project includes the following features which, would further reduce energy demands:

- *Proximity to mass transit:* The Project Site is an infill site within a Transit Priority Area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.
- *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with four commercial/retail buildings and a surface parking lot, which is located in a highly developed area of the Central City Community. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

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<sup>55</sup> California Energy Commission, 2016 Building Energy Efficiency Standards, website: <http://www.energy.ca.gov/title24/2016standards/>, accessed February 2019.

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- *Trip Reduction:* In addition to its location in a Transit Priority Area, the Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 182,386). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 23 short-term bicycle parking spaces and 172 long-term bicycle parking spaces, for a total of 195 required bicycle parking spaces. The Proposed Project proposes to provide 195 spaces, which is consistent with the requirements in the LAMC.
- *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2016 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed residential units such as low-flow water fixtures and energy conservation appliances.

***Therefore, with incorporation of the features identified above, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant..***

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects within the City of Los Angeles would further increase demand for electricity, natural, and fossil fuels.

### ***Electricity***

The Proposed Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. ***Cumulative impacts to electricity service would therefore be less than***

**significant.**

### **Natural Gas**

Development of the Proposed Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, the SCG allocated approximately 112.5 billion cubic feet to residential, small industrial and commercial customers. As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SCG's ability to serve each related project. As such, it is anticipated the related projects and the Proposed Project would be accommodated by SCG. **Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.**

### **Fossil Fuels**

The Proposed Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within a Transit Priority Area, which is defined as being within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. **As such, the Proposed Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.**

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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The following section summarizes and incorporates by reference information from the following reports:

- E.1 City of Los Angeles, Department of Building and Safety, Soils Report Approval Letter, LOG # 111721, Tract 2289, Lots 34-41, 1123-1161 S. Main Street, February 4, 2020 ; and
- E.2 Geotechnologies, Inc., Preliminary Geotechnical Engineering Investigation, Proposed Mixed-Use Tower, 1123 through 1161 South Main Street, Los Angeles, California, December 19, 2018.
- E.3 Natural History Museum of Los Angeles County, Paleontological Records Search, February 27, 2019.

The above reports are included in Appendix E to this SCEA.

- 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.** A significant impact may occur if a Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called California Geologic Survey (CGS), faults may be categorized as Holocene-active, Pre-Holocene, or Age-undetermined. Holocene-active faults are those which show evidence of surface displacement within the last 11,700 years. Pre-Holocene faults are those that show evidence of most recent surface displacement within the last 11,700 years. Age-undetermined faults are faults where the recency of fault movement has not been determined.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “Holocene-active” faults utilizing the same aging criteria as that used by CGA. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,700

years. It is recency of fault movement that the CGA considers as a characteristic for faults that have a relatively high potential for ground rupture in the future.

Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature and results of site reconnaissance, no known Holocene-active or Pre-Holocene faults underlie the Project Site. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, the potential for surface ground rupture due to faulting occurring beneath the Project Site during the design life of the proposed structure is considered low.

In addition, the 2019 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Proposed Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

According to the Geotechnical Investigation, the Project Site is located approximately 2.43 miles to the southeast of the Santa Monica Fault, which is a known Holocene-active fault. Thus, 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 mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. The Grading Division of the Department of Building and Safety has reviewed the Preliminary Geotechnical Engineering Report and concluded that the referenced report is acceptable, provided that prior to issuance of any building or grading permits, a comprehensive geotechnical report with supplemental field exploration, laboratory testing, updated engineering analyses and foundation recommendations shall be submitted to the Department for review and approval (see Appendix E.1 to this SCEA). Final sign-off from the Department of Building and Safety would ensure that the Proposed Project meets the applicable performance measures. Accordingly, with the design and construction of the Proposed Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, impacts associated with seismic hazards would be less than significant. ***Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, Proposed Project impacts would be less than significant.***

#### ii) Strong seismic ground shaking?

**Less Than Significant Impact.** A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in

Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and was concluded to have a low potential for surface rupture beneath the Project Site. However, the nearest earthquake fault, the Santa Monica Fault, is located approximately 2.43 miles to the northwest. Therefore, the Project Site is located in the 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. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Geotechnical Investigation concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and implemented during design and construction. Additionally, the Proposed Project would be required to comply with current engineering standards, 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 Proposed Project (contained in Appendix E.1 to this SCEA), as it may be subsequently amended or modified. 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 would be implemented for the Proposed Project, construction and operation of the Proposed 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, the Proposed Project impacts associated with strong seismic ground shaking would be less than significant.***

**iii) Seismic-related ground failure, including liquefaction?**

**Less Than Significant Impact.** A project would have a significant impact related to geology and soils if it exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The current standard of practice, as outlined in the "Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California" and "Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California" requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained,

primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

According to the County of Los Angeles Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, based on the Geotechnical Investigation, the Seismic Hazards Maps for the State of California (CDMG, 1999) does not classify the Project Site as part of the potentially “Liquefiable” area. This determination is based on groundwater depth record, soil type and distance to a fault capable of producing a substantial earthquake. Groundwater was not encountered during exploration, conducted to a maximum depth of 60 feet below the existing grade. The historically highest groundwater level for the Project Site is reported to be on the order of 115 feet below grade. Based on the density of the soils underlying the Project Site, and the mapped depth to the historically highest groundwater level, the soils underlying the Project Site are not considered capable of liquefaction during the ground motion expected during the design-based earthquake. Therefore, the potential for liquefaction occurring at the Project Site is considered to be remote. The Proposed Project shall also comply with the conditions contained within the Department of Building and Safety’s Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. **Therefore, compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.**

**iv) Landslides?**

**No Impact.** A project would have a significant impact related to geology and soils if the Proposed Project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project’s exacerbation of the existing environmental conditions. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is not located within a City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for slope instability according to the City of Los Angeles Safety Element. Furthermore, the Project Site and project area is not within an area identified as having a potential for seismic slope instability as designated by the “State of California Seismic Hazard Zones” map. The Geotechnical Investigation stated the probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the general lack of elevation difference slope geometry across or adjacent to the Project Site. Therefore, no impact would occur. **The Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, and no impact would occur.**

**b) Result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water

## VII. Geology and Soils

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erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Although development of the Proposed Project has the potential to result in the erosion of soils during grading, excavation, and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. 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. The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor (see RCM-GEO-1, below). In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of 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. The application of Best Management Practices (BMPs) includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer (see RCM-GEO-2, below).

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit (see RCM HYD-1, abo. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during construction.

Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shoring during construction of the Proposed Project. 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. ***The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, will ensure that impacts to soil erosion or the loss of topsoil are reduced to less than significant levels.***

### Regulatory Compliance Measures

**RCM-GEO-1 Geology (Erosion/Grading/Short-Term Construction Impacts).** The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

**RCM-GEO-2 Geology (Erosion/Grading/Short-Term Construction Impacts).** Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices (“BMPs”) during grading and excavation to reduce erosion, including, but not limited to the following:

- Excavation and grading activities shall be scheduled during dry weather periods to the extent practical. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
- Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

**See also RCM-HYD-1 (National Pollutant Discharge Elimination System General Permit).**

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

**Less Than Significant Impact.** The Proposed Project would have a significant impact related to geology and soils if it is 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 Proposed Project’s exacerbation of existing environmental conditions.

For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the general lack of elevation difference across or adjacent to the Project Site. Based upon the exploration, laboratory testing, and research, the Geotechnical Investigation concluded that construction of the Proposed Project is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations

presented in the Geotechnical Investigation are followed and implemented during construction. ***With the implementation of the recommendations contained within the Geotechnical Investigation and the Building Code requirements as discussed above in Checklist Question VII (a), the potential for geologic hazards would be reduced to a less than significant level.***

- 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?**

**Less Than Significant Impact.** A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

As discussed in the Geotechnical Investigation, subsurface exploration involved drilling six boreholes to a maximum depth of approximately 60 feet below the existing grade. An expansion index test was performed for the on-site soils and was found to range between the “low” and “very low” expansion range (between 7 and 35). The Proposed Project would incorporate the recommended reinforcing noting in the “Foundation Design” and “Slabs on Grade” sections of the Geotechnical Investigation. ***With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the Building Code requirements, impacts related to expansive soil would be less than significant.***

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. ***Thus, no impact would occur as a result of septic tanks or alternative wastewater disposal systems.***

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been

previously developed and graded. The Project Site and immediate surrounding areas do not contain any unique geologic features or known vertebrate paleontological resources.<sup>56</sup> This is further supported by correspondence received from the Natural History Museum of Los Angeles County dated February 27, 2019 (contained in Appendix E.2), which states that no vertebrate fossil localities lie directly within the Project Site boundaries. However, the proposed Project Site area does contain surface composites of younger Quaternary Alluvium. Although these deposits usually do not contain significant fossil vertebrates in the upper layers, the Natural History Museum has concluded that varying depths of excavation may well contain significant vertebrate fossils. The Proposed Project does not propose any subterranean levels, but may disturb a few feet below the ground surface in order to building the proper building foundations. As such, the potential exists for the accidental discovery of any unknown paleontological materials that may lie below the surface. Accordingly, as described in Regulatory Compliance Measure RCM-GEO-3, below, if paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. 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. ***With adherence to regulatory compliance measures, any impacts to paleontological resources would be less than significant.***

### **Regulatory Compliance Measure**

**RCM-GEO-3 Paleontological.** Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and:

- The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
- The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

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<sup>56</sup> *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*



**Cumulative Impacts**

**Less Than Significant Impact.** Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts concluded that, through the implementation of regulatory compliance measures and recommendations in the Geotechnical Investigation, Project impacts would be reduced to less than significant levels. Furthermore, with respect to paleontological resources, the regulatory compliance measure detailed above, would ensure Project impacts to paleontological resources are less than significant level. Because the discovery of paleontological resources would be geographically limited to the immediate area of the find, the potential for cumulative impacts to occur with respect to paleontological resources would be less than significant. ***Therefore, the Proposed 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.***

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

## ***GHG and Global Climate Change Background***

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

The principal GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H<sub>2</sub>O). CO<sub>2</sub> is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e).

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 Senate Bill 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.

## **Regulatory Environment**

### Executive Order S-3-05

Executive Order S-3-05, issued in June 2005 by Governor Arnold Schwarzenegger (Governor Schwarzenegger), established GHG emissions targets for the State, as well as a process to

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ensure the targets are met. The order directed the California Environmental Protection Agency (CalEPA) to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. The Statewide GHG targets established by Executive Order S-3-05 are as follows:

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

### Executive Order B-30-15

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions to 40 percent below 1990 emission levels by the year 2030.

### 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.

### Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.<sup>57</sup> The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

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<sup>57</sup> CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% is the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a “coordinated set of solutions” to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California’s 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.<sup>58</sup> It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted “California’s 2017 Climate Change Scoping Plan” that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor’s Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California’s climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction

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<sup>58</sup> *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

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from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

### 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 greenhouse gas (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 able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (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 greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal passed by AB 32.<sup>59</sup>

The Cap-and-Trade Program covers approximately 85 percent of California's GHG emissions.<sup>60</sup> The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.<sup>61</sup> Furthermore, the Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with VMT indirectly are covered by the Cap-and-Trade Program.

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<sup>59</sup> California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time>, accessed April 2019.

<sup>60</sup> Center for Climate and Energy Solutions, California Cap-and-Trade, <https://www.c2es.org/content/california-cap-and-trade/>, accessed February 21, 2019.

<sup>61</sup> While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015.

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Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

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

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 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 Senate Bill 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 LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

#### Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's VMT in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

With respect to motor vehicles, page 48 of the 2008 Scoping Plan states that local governments will play a significant role in the regional planning process to reach passenger vehicle greenhouse gas emissions reduction targets. Local governments have the ability to directly influence both the siting and design of developments in a way that reduces greenhouse gases associated with vehicle travel, as well as energy, water, and waste. A partnership of local and regional agencies is needed to create a sustainable vision for the future that accommodates population growth in a carbon efficient way while meeting housing needs and other planning

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goals. Integration of the sustainable communities' strategies or alternative planning strategies with local general plans will be key to the achievement of these goals. State, regional, and local agencies must work together to prioritize and create the supporting policies, programs, incentives, guidance, and funding to assist local actions to help ensure regional targets are met. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in helping to reach regional targets. Thus, based on the above targets noted in the Scoping Plan, a new development Project that can demonstrate it directly influences both the siting and design of new developments in a way that reduces greenhouse gases associated with vehicle travel would be considered consistent with statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

### Connect SoCal (2020-2045 RTP/SCS)

As set forth in Chapter 4 of this SCEA, on September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. On October 30, 2020, through Executive Order G-20-239, CARB accepted SCAG's 2020 RTP/SCS as a GHG reduction plan.<sup>62</sup>

Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Within the Connect SoCal Plan, the 2020 SCS would, when implemented, meet the applicable 2035 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. CARB staff's determination summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. These strategies identify

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<sup>62</sup> *State of California, Air Resources Board, Executive Order G-20,239, website: <https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689>, accessed April 2021.*

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how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

### 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 CO<sub>2</sub>e 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., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

### **Local Policies and Regulations**

The City is addressing the issue of global climate change through implementation of the Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO<sub>2</sub> to 35 percent below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

### City of Los Angeles Sustainable City pLAN

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 greenhouse gas 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 greenhouse gas accounting. L.A. has already reduced its greenhouse gas 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. In 2017 30% of the LADWP's energy was from renewable energy sources. In



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2019, the City and LADWP adopted new sustainability goals to supply 55% renewable energy by 2025; 80% by 2036 and 100% by 2045.<sup>63</sup>

### LA 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 greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, 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%, 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 development 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**

The SCAQMD, the State CEQA Guidelines, and the City do not provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the City has elected to adopt the qualitative threshold as required in Section 15064.4 of the CEQA Guidelines. This analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Guidelines Section 15064.4 states a lead agency "should consider," among other factors, "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting" (id., subd. (b)(1)) and "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project" (id., subd. (b)(2)). The Guidelines, however, do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions.

For purposes of this analysis, a significant impact would occur if the Proposed Project's design

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<sup>63</sup> *City of Los Angeles, L.A.'s Green New Deal, Sustainable City Plan, 2019.*

features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's Connect SoCal, and the LA Green Building Code.

### PROJECT-SPECIFIC IMPACTS

**a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less Than Significant Impact.** Neither the SCAQMD, the State CEQA Guidelines, nor the City provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

The Guidelines do not mandate the use of absolute numerical thresholds to measure the significance of greenhouse gas emissions. A significant impact would occur if a project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. For purposes of this analysis, a significant impact would occur if the Proposed Project's design features are not substantially consistent with the applicable policies and/or regulations outlined in the Scoping Plan, SB 375, SCAG's Connect SoCal, and the L.A. Green Building Code.

### Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 30-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 6.8, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 6.8, the total GHG emissions from Project construction activities would be 2,168.04 metric tons with the greatest annual emissions occurring in 2024. As recommended by the SCAQMD, the total GHG construction emissions are amortized over the projected 30-year lifetime of the Project to be factored into the Proposed Project's operational emissions in order to determine the Proposed

Project's annual GHG emissions inventory.

**Table 6.8**  
**Proposed Project Construction-Related Greenhouse Gas Emissions**

<b>Year</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year) <sup>a</sup></b>
2023	500.78
2024	1,008.24
2025	657.98
2026	1.04
<b>Total Construction GHG Emissions</b>	<b>2,168.04</b>
<b>Amortized Annual Emissions</b>	<b>72.27</b>
<sup>a</sup> Construction CO <sub>2</sub> values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix F, Greenhouse Gas Emissions Worksheets. <sup>b</sup> Consistent with SCAQMD recommended methodology for addressing construction emissions, the total construction emissions were amortized over a 30 year projected lifetime.	

## Operation

### Baseline GHG Emissions

The Project Site is developed with four commercial buildings, totaling approximately 28,110 square feet. One structure on the Project Site, totaling 1,400 square feet, is vacant. As such, the existing conditions baseline includes 26,710 square feet of active uses. The operations of the on-site commercial uses generate GHG emissions as a result of vehicle trips and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 6.9 Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing commercial buildings at the Project Site. As shown in Table 6.9, the existing operations on the Project Site generate approximately 1,289.84 CO<sub>2</sub>e MTY.

**Table 6.9**  
**Existing Project Site Greenhouse Gas Emissions**

<b>Emissions Source</b>	<b>CO<sub>2</sub>e Emissions (Metric Tons per Year)</b>
Area	<0.01
Energy	2.61
Mobile	1,284.71
Waste	2.11
Water	0.40
<b>Total</b>	<b>1,289.84</b>
Calculation data and results provided in Greenhouse Gas Emissions Calculations Worksheets. (See Appendix F to this SCEA)	

## Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project's compliance with the *L.A. Green Building Code* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. The Proposed Project's emissions were calculated using CalEEMod for a base project without the energy conservation measures mandated by the Green Building Code and with GHG reduction measures for purposes of quantifying the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table 6.10, below, the net increase in GHG emissions generated by the Proposed Project under the Base Project Without GHG Reduction Measures<sup>64</sup> and without the removal of the GHG emissions generated by the existing land uses to be demolished would be 3,466.86 CO<sub>2</sub>e MTY. The Project With GHG Reduction Measures scenario including removal of existing use GHG emissions would result in a net increase of 1,843.68 CO<sub>2</sub>e MTY. For purposes of this comparison, it should be noted that the Proposed Project's structural and operational features would include installing energy efficient lighting, low-flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Project (see Regulatory Compliance Measures RCM-GHG-1 through RCM-GHG-6, below). When considering the fact that the Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB 375, and SCAG's Connect SoCal), the Proposed Project would realize a 47% reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use. The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project's infill and smart growth attributes (i.e., replacement of existing uses and location of high density housing and neighborhood serving retail uses in a high quality transit area) and its compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

## Regulatory Compliance Measures

**RCM-GHG-1** The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the multi-family dwelling units.

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<sup>64</sup> *"Base Project" assumes construction on a vacant lot and no energy conservation measures, as opposed to the "Proposed Project" which includes GHG conservation measures and replaces an existing land use that generates GHG emissions.*

**RCM-GHG-2** The Project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. 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.

**RCM-GHG-3** As mandated by the LA Green Building Code, the Project is 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.

**RCM-GHG-4** The Project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485.

**RCM-GHG-5** Greenhouse Gas Emissions (Green Building Code): In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified.

**RCM-GHG-6** The Project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving systems and technologies in buildings and landscapes to conserve and reduce water usage.

Indoor Water Use. Pursuant to Section 99.04.303.4 of the LAMC, a 20% reduction in the overall use of potable water within a building shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fittings as required by the Los Angeles Building Standards.

Outdoor Water Use. Pursuant to Section 99.04.304.1, a water budget shall be developed for landscape irrigation use that conforms to the local water efficient landscape ordinance or to the California Department of Water Resources' Model Water Efficient Landscape Ordinance, whichever is more stringent. Additionally, in new residential construction or building addition or alteration over 500 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the criteria specified in Section 99.04.304.2 and meet manufacturer's recommendations. Furthermore, outdoor water metering, swimming pool covers, and exterior faucets are regulated under the LAMC Section 99.04.304 for outdoor water usage.

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In addition to the GHG emission reductions described above, it is important to note that the CO<sub>2</sub> estimates from mobile sources (particularly CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in fact new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

**Table 6.10  
Proposed Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO <sub>2</sub> e Emissions (Metric Tons per Year)		
	Base Project Without GHG Reduction Features	Proposed Project	Percent Reduction <sup>a</sup>
Area	6.27	6.27	0%
Energy (Electricity)	1,364.32	1,305.39	4%
Energy (Natural Gas)	180.70	172.08	5%
Mobile (Motor Vehicles)	1,442.41 <sup>b</sup>	1,264.32	12%
Stationary	2.29	2.29	0%
Waste	90.58	45.29	50%
Water	308.02	265.61	14%
Construction Emissions <sup>c</sup>	72.27	72.27	--
<b>Proposed Project Total:</b>	<b>3,466.86</b>	<b>3,133.52</b>	<b>10%</b>
<i>Less Existing Project Site:</i>	-- <sup>d</sup>	-1,289.84	--
<b>Proposed Project Net Total:</b>	<b>3,466.86</b>	<b>1,843.68</b>	<b>47%</b>

*Notes:*

<sup>a</sup> The Percent Reduction is not a quantitative threshold of significance, but shows the efficacy of the Project's compliance with the various regulations, plans and policies that have been adopted with the intent of reducing GHG emissions.

<sup>b</sup> Since the mobile trips already incorporates trip reductions, the GHG emissions prior to reductions was taken by multiplying the ratio of the reduced and unreduced trips (1,072 : 1,223) multiplied by the ratio of GHG emissions from the reduced trips (1,264.32 : X).

<sup>c</sup> The total construction GHG emissions were amortized over 30 years and added to the operation of the Project as per SCAQMD guidance.

<sup>d</sup> The existing emissions were not deducted from the Base Project Without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active commercial uses.

Calculation data and results provided in Appendix F, Greenhouse Gas Emissions Worksheets.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where

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the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

**Consistency with SB 375 and SB 32**

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project’s consistency with the SCS and Scoping Plan is provided further below.

**Table 6.11  
Consistency with Applicable SB 32 Scoping Plan Measures**

Scoping Plan Measures	Consistency
<p><b>Energy Efficiency.</b> Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p><b>Consistent.</b> The Proposed Project would be consistent with the Scoping Plan’s policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet LA Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY Star-rated appliances.</p>
<p><b>Renewables Portfolio Standard.</b> Achieve 33 percent renewable energy mix statewide.</p>	<p><b>Consistent.</b> The Proposed Project would not impede the Scoping Plan’s policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Project would use energy from the Los Angeles Department of Water and Power (LADWP). In 2017 30% of the LADWP’s energy was from renewable energy sources. In 2019, the City and LADWP adopted new sustainability goals to supply 55% renewable energy by 2025; 80% by 2036 and 100% by 2045. (L.A.’s Green New Deal, Sustainable City Plan, 2019)</p>
<p><b>Green Building Strategy.</b> Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.</p>	<p><b>Consistent.</b> The Proposed Project would be consistent with the Scoping Plan’s policy to expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low flow plumbing fixtures, and installing ENERGY STAR-rated appliances.</p>

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<p><b>Recycling and Waste.</b> Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.</p>	<p><b>Consistent.</b> The Proposed Project would be consistent with the Scoping Plan’s policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity. (See response to Checklist Question XIX(d), below). It would meet the City’s 70 percent waste diversion rate goal and comply with the City’s Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.</p>
<p><b>Water.</b> Continue efficiency programs and use cleaner energy sources to move and treat water.</p>	<p><b>Consistent.</b> The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.</p> <p>The Applicant has also committed to comply with the City of Los Angeles Low Impact Development Ordinances (City Ordinance No. 181,899 and No.183,833) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the entire Project as feasible, pending final determination.</p>
<p><i>Measures not listed are not applicable to this Project. Source: Parker Environmental Consultants, 2021.</i></p>	

**Consistency with Connect SoCal**

The Proposed Project is consistent with the following key GHG reduction strategies in SCAG’s Connect SoCal (2020 RTP/SCS), which are based on changing the region’s land use and travel patterns:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new commercial uses within a HQTAs. The Connect SoCal plan defines a HQTAs as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Based on a walkability assessment of the Project area by WalkScore.com, the Project Site is rated with a score of 95 of 100 possible points and defined as “walker’s paradise – daily errands do not require a car.” In addition, the Proposed Project would also provide bicycle storage areas for Project residents and guests. Walkscore.com also allocates a transit score of 100 to the Project Site, described as “riders paradise, world class public transportation,” and a bike score of 78 to the Project Site, described as “very bikeable.” The Proposed Project



would provide employees and patrons with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal.

**Consistency with L.A. Green Building Code**

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, provide on-site storage for short- and long-term bicycle parking areas, and provide Energy-Star rated appliances where applicable. The Proposed Project would comply with these mandatory measures. Therefore, the Proposed Project is consistent with the L.A. Green Building Code.

As demonstrated above, the Proposed Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. ***Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.***

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less Than Significant Impact.** A significant impact would occur if the Proposed Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The Proposed Project would be consistent with applicable local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan, which is aimed at achieving 40 percent reduction below 1990 statewide GHG emission levels by 2030. While the statewide emission reduction goals called out in SB 32, SB 375, and CARB's 2017 Scoping Plan do not require or infer a specific numeric emission reduction in GHG emissions for development projects, the Proposed Project's compliance with the LA Green Building Code would ensure that the Proposed Project would not conflict with or impede the State's ability to reach the emission reduction targets as specific in the Statewide Plans and policies. Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** An individual project's GHG emissions typically would be relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented in this Section analyzes whether the Proposed Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the project's contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in GHG emissions. The Proposed Project's GHG and the resulting level of significance is appropriately assessed in terms of the cumulative impact on global GHG emissions on climate change. Accordingly, a quantified analysis of the GHG emissions anticipated to result from construction and operational activities was calculated as part of the cumulative impact analysis. As part of that analysis, the Proposed Project's GHG emissions were analyzed on a project-specific basis with respect to its impacts on global climate change.

As shown in the analysis above, the Proposed Project would be consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32, SB 375, Connect SoCal, and the L.A. Green Building Code that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. By redeveloping an underutilized site and developing a mixed-use project with residential and community serving retail land uses in a high quality transit area, the Project would reduce VMTs. ***Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.***

# 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following section summarizes and incorporates the reference information from the following reports (contained in Appendix G to this SCEA):

- Phase I Environmental Site Assessment Report, 1100-1132 & 1123-1137-C South Main Street and 106-112 East 11<sup>th</sup> Street, Los Angeles, California 90015, prepared by Partner Engineering and Science, Inc., dated May 26, 2015. (Appendix G.1);

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- Phase I Environmental Site Assessment Report, 1147-1151 South Main Street, Los Angeles, California 90015, prepared by Partner Engineering and Science, Inc., dated November 13, 2018. (Appendix G.2);
- Phase I Environmental Site Assessment Report, 1155 and 1165 South Main Street, Los Angeles, California 90015, prepared by Andersen Environmental, dated March 14, 2014. (Appendix G.3);
- Phase II Environmental Site Assessment Report, 1155 & 1165 South Main Street, Los Angeles, CA 90015, prepared by Andersen Environmental, dated May 28, 2014. (Appendix G.4); and
- Preliminary Subsurface Methane Gas Investigation at 1123-1161 South Main St., Los Angeles, California (“Methane Report”), prepared by GeoKinetics, dated November 29, 2018. (Appendix G.5)

**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. The Proposed Project includes the construction of a mixed-use development with 363 residential units and 12,500 square feet of commercial/retail space. During the operation of the Proposed Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. **Therefore, the Proposed 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 to 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)

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the project involved the creation of any health hazard or potential health hazard. 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.

### **Phase I Environmental Site Assessments**

1100-1132 & 1123-1137-C South Main Street and 106-112 East 11<sup>th</sup> Street (Appendix G.1), dated May 26, 2015

#### Site Reconnaissance

On May 18, 2015, Partner Engineering and Science, Inc. (“Partner”) staff conducted a site reconnaissance of the subject property. Partner identified the following hazardous substance used, stored, and/or generated on the subject property: a 5 x 55-gallon drum of unlabeled substance. Based on the overall small quantities observed, no leaks, spills or stains were observed and lack of violations on-file, these materials are not expected to represent a significant environmental concern.

#### Records Review

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources (EDR). As concluded in the Phase I ESA, the subject property is identified on the HAZNET database in the following listings:

- The subject property, identified as Ix Hans Engineering Company at 1124 South Main Street is listed on the HAZNET database. According to the database, 0.25 tons of tank bottom waste was manifested in 1995. No additional information is available, and this facility is not listed on any UST databases or any databases indicating an unauthorized release.
- The subject property, identified as 11<sup>th</sup> and Main Partners, LLC at 1100-1132 South Main Street, manifested 8.42 tons of asbestos containing waste in 2006. No additional information is available. Based on the regulatory status, this listing is not expected to represent a significant environmental concern. In addition, the subject property, (identified as 11<sup>th</sup> and Main Partners, LLC at 106-112 South Main Street) manifested 2.52 tons of asbestos containing waste in 2006. No additional information is available, and this facility is not listed on any UST databases or any databases indicating an unauthorized release. Based on the regulatory status, this listing is not expected to represent a significant environmental concern.

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- The subject property, identified as Lax C Incorporated at 1100 South Main Street, manifested 2.33 tons of oil/water separator sludge in 2004. No additional information is available. However, this facility is not listed on any UST databases or any databases indicating an unauthorized release. Based on the regulatory status, this listing is not expected to represent a significant environmental concern.

Additionally, adjacent properties were reviewed, which consisted of observing the adjacent properties from the subject property premises. No items of environmental concern were identified on the adjacent properties during the site assessment, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

### Findings

The purpose of the ESA was to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E1527-13) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require cleanup, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances. Partner did not identify RECs or CRECs at the subject property. The following historical recognized environmental condition (HREC) was identified during the course of the assessment:

- The subject property, identified as Ix Hans Engineering Company at 1124 South Main Street, is listed on the Facility and Manifest (HAZNET) database. According to the database, 0.25 tons of tank bottom waste was manifested in 1995. No additional information is available regarding a potential former underground storage tank (UST) at this facility, and this facility is not listed on any UST databases or any databases indicating an unauthorized release. The client provided Partner with a No Further Action (NFA) letter from LAFD dated January 14, 1998, which indicated a Closure Report was submitted for Ana Trading Company at 1137 South Main Street dated October 1995. However, city directory research indicates Ana Trading Company was located at 1124 South Main Street, so it is likely the HAZNET listing and the LAFD letter are related. As of this date, Partner has not received a response to Freedom of Information Act (FOIA) requests from either the Los Angeles Fire Department (LAFD) or Los Angeles County Public Health Investigations (LAC PHI), who provide regulatory oversight of USTs and hazardous materials. Therefore, no details are available regarding any soil, groundwater, or soil gas sampling or the concentrations of contaminants left in place, if any. However,

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based upon closure of the presumed UST, the presumed UST represents a historical recognized environmental condition.

An environmental issue refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) is present. Overall, suspect ACMs were observed in good condition and do not pose a health and safety concern to the occupants of the subject property at this time. Should these materials be replaced, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building-occupants. See Regulatory Compliance Measure RCM-HAZ-1, below.

This assessment has not revealed evidence of recognized environmental conditions in connection with the subject property. Based on the conclusions of this assessment, Partner recommends no further investigation of the subject property at this time.

1147-1151 South Main Street (Appendix G.2), dated November 13, 2018

### Site Reconnaissance

On November 6, 2018, Partner staff conducted a site reconnaissance of the subject property. No evidence of the use of reportable quantities of hazardous substances was observed on the subject property. Therefore, no potential environmental concerns were identified during the onsite reconnaissance.

### Records Review

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources (EDR). The subject property is identified as an EDR Historical Auto site in the following regulatory database report:

- The subject property, identified as Moore Pfeif at 1151 South Main Street, was identified by EDR in historical resources as an automobile repairing facility in 1942. According to a review of building permits, the tenant occupying the subject property at that time was operating as a fender and auto body repair shop which was converted to a print shop by 1945. Auto body repair shops frequently utilize paints, thinners, welding gasses, fillers and other materials but less frequently use oils, other automotive fluids and degreasers such as chlorinated solvents which full service drivetrain repair shops might use and are more persistent in the environment. Furthermore, the subject property was demolished, regraded and completely redeveloped in 1986. Based on the presumed nature of auto body repair operations, the elapsed time since the occupancy and redevelopment of the property, this listing is not expected to represent a significant environmental concern.

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In addition, the adjacent property to the north was identified as EDR Historical Auto Station site in the following regulatory database report:

- The adjacent property, identified as Station #23 at 1131 South Main Street, is located adjacent to the north of the subject property. According to the database report, Station #23 operated a gasoline service station on the premises in 1982. No additional information was provided in the database report. This site is not listed not any release database that would impact the subject property. Additionally, a review of building permit records for this property revealed the use to be retail stores between the 1950s and 1980s and city directories for this address revealed no evidence of a gas station. Based on the lack of a documented gas station at this site, this listing is not expected to represent a significant environmental concern.

### Findings

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E1527-13) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require cleanup, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances. Partner did not identify RECs, CRECs, or HRECs at the subject property. The following environmental issues were identified during the course of the assessment:

- The subject property historically operated as an auto body repair shop during the early 1940s and was identified by EDR in historical resources as an automobile repairing facility in 1942. According to a review of building permits, the tenant occupying the subject property at that time was operating as a fender and auto body repair shop which was converted to a print shop by 1945. Auto body repair shops frequently utilize paints, thinners, welding gasses, fillers and other materials but less frequently use oils, other automotive fluids and degreasers such as chlorinated solvents which full service drivetrain repair shops might use and are more persistent in the environment. Furthermore, the subject property was demolished, regraded and completely redeveloped in 1986. Based on the presumed nature of auto body repair operations, the elapsed time since the occupancy and redevelopment of the property, the historical auto body shop operations are not expected to represent a significant environmental concern.
- According to a review of Sanborn maps and building permit records, the subject property was formerly occupied by a print shop from 1945 to circa 1970. Many printing industries generate waste ink, ink sludges and use cleaners that might contain solvents or heavy metals. Overall, the print shop operations appear to have been limited to one portion of a relatively small building. Additionally, the former building was completely demolished in



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1986, regraded and developed with the current two buildings that year. Based on the relatively limited scale of printing operations depicted on the Sanborn maps, the elapsed time since the occupancy and subsequent redevelopment of the property, the historical print shop operations are not expected to represent a significant environmental concern.

This assessment has no revealed evidence of RECs in connection with the subject property. Based on the conclusions of this assessment, Partner recommends no further investigation of the subject property at this time.

### 1155 and 1165 South Main Street (Appendix G.3), dated March 14, 2014

#### Site Reconnaissance

On March 6, 2014, Andersen Environmental staff conducted a site reconnaissance of the subject property. The site inspection was conducted to attempt to identify current site use(s), current hazardous materials storage, and evidence of past site uses and hazardous material storage and to identify evidence of other recognized environmental conditions. No RECs were observed on the exterior or interior of the subject properties.

#### Records Review

A radial database search was conducted in accordance with the specifications defined in ASTM E 1527-13 which sets the radial search distances for each regulatory database. The radial database search was conducted by EDR on March 3, 2014. The subject property is listed on the Facility and Manifest (HAZNET) database in the following report:

- According to the listing, between 1993 and 2000, Winston Tire Company generated hazardous wastes including unspecified aqueous solution, oil/water separation sludge, aqueous solution with total organic residues less than 10 percent, and unspecified solvent mixture. Oil/water separation sludge is indicative of the presence of a clarifier at the subject property. During the site reconnaissance, the majority of the concrete floors in the structure formerly occupied by Winston Tire Company (1165 South Main Street parcel) were not observable.

In addition, the LAFD HazMat, LAFD Central Industrial Unit (LAFD CIU), LAFD Underground Storage Tank Division (LAFD UST), Los Angeles County Department of Health Services, Public Health Investigations (LACDHS PHI), and City of Los Angeles Bureau of Sanitation (LABS) were contacted regarding hazardous materials, underground storage tank, and industrial waste discharge records for the subject property. The following report details the findings:

- According to files provided by the LACDHS PHI, an inspection report from August 19, 1995 listed two 55-gallon drums of waste oil disposed by Evergreen Environmental, one 55-gallon drum of used oil filters, one 55-gallon drum of antifreeze, and 30 gallons of parts cleaner. A Notice of Violation was issued to Winston Tires for overflowing waste oil and antifreeze drums, and there were floor drains noted. The inspector asked about the

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presence of a clarifier, but it was not confirmed whether a clarifier existed or not. An inspection report from July 6, 1998 listed 30 gallons of parts cleaner disposed by Safety Kleen, 55 gallons of antifreeze disposed by Asbury Oil, and 100 gallons of waste oil and used oil filters disposed by Asbury Oil at the Winston Tires auto repair garage on the subject property. The subject property was historically utilized for auto repair operations including tire rebuilding from 1906 to 2004. Records pertaining to the use of hazardous materials for the auto repair tenants prior to 1995 were not available as they operated during a time when the regulatory measures governing the use of hazardous materials of this nature were not as stringent as they are today. Based on the long term duration of the auto repair operations onsite (approximately 98 years), likely use of hazardous materials during a time without stringent regulatory oversight, and documented drains and likely associated clarifier (preferential pathways to the subsurface), the former auto repair operations at the subject property are considered to be a recognized environmental condition.

The following adjacent and immediately surrounding properties were also identified within the regulatory database reports:

Ryder Truck Rental (100 West 12<sup>th</sup> Street) - The southwest adjoining property across West 12<sup>th</sup> Street (hydrologically down-gradient) is listed on the Hazardous Substance Storage Container Database (HIST UST) database. According to the listing, the site operated a 10,000-gallon waste underground storage tank (UST). The owner's name and address is listed as Herald Examiner at 1201 South Main Street. For more information refer to the listing below.

Los Angeles Herald Examiner (1201 South Main Street) - The southwest adjoining property across West 12<sup>th</sup> Street (hydrologically down-gradient) is listed on the HIST UST, Facility Inventory Database (CA FID UST), and Statewide Environmental Evaluation and Planning System Underground Storage Tank (SWEEPS UST) databases. Historical research indicates that the site was occupied by a gasoline service station and truck yard at least from 1967 to 1970. According to the listings, the site operated a 9,950-gallondiesel UST. Additionally, according to listings for a historical address associated with the property, the site also operated a 10,000-gallon waste UST (Ryder Truck Rental above). The location of the tanks is not indicated within the listings or any resources researched for the purposes of this report. As such the potential presence of the USTs within 100 feet of the subject property represents a potential vapor encroachment condition for the subject property. However, based on the lack of evidence of a release from the USTs, a potential vapor intrusion condition is considered unlikely. Based on the foregoing, and the down-gradient location of the tanks, the tanks at the adjoining property are not expected to represent a significant environmental concern to the subject property.

Moore Pfeif (1151 South Main Street) - The northeast adjoining property (hydrologically up-gradient) is listed on the EDR US Historical Auto Station (EDR US Hist Auto Stat)

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database. According to the listing, the site operated an automobile repairing facility in 1942. The site is not listed on any of the databases indicative of a release. Based on the lack of evidence of a release, the former automobile repair operations at the adjoining property are not expected to represent a significant environmental concern to the subject property.

### Additional Issues

#### *Asbestos*

Based on the age of the structure associated with 1165 South Main Street (1921), there is a potential for asbestos containing building materials within the structure, however, no testing was completed as part of this report. Potential asbestos-containing materials include mastic associated with linoleum and tile flooring. The ACM appeared to be in good condition. Based on the age of the structure associated with 1155 South Main Street (1981), the potential for asbestos containing building materials within the structure is considered to be low.

#### *Lead Based Paint*

Based on the age of the structure associated with 1165 South Main Street (1921), there is a potential for lead based paint within the structure. Painted surfaces appeared to be in good condition. However, no testing was completed as part of this report. Based on the age of the structure associated with 1155 South Main Street (1981), the potential for lead based paint within the structure is considered to be low.

#### *Radon*

Radon potential at the subject property is considered low.

#### *Mold*

Andersen Environmental did not observe visible or olfactory indications of the presence of mold, nor did Andersen Environmental observe obvious indications of significant water damage.

#### *Methane Zone*

According to the City of Los Angeles Methane Zone map, the Project Site is located within a methane buffer zone. Due to the potential environmental risk associated with construction in Methane Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property and methane mitigation systems may be required (Division 71 of the Los Angeles Building Code). The Methane Report is provided in Appendix G.5 to this SCEA).

### Findings

No HRECs or CRECs were identified at the subject property, however the potential for hazardous materials to impact the property subsurface from former auto repair operations at the subject property for 98 years (1906 to 2004) with documented drains and likely associated clarifier represents a REC. Therefore, a Phase II ESA was recommended.

### Phase II Environmental Site Assessment

#### 1155 & 1165 South Main Street (Appendix G:4), dated May 28, 2014

A Phase II ESA was conducted to evaluate whether former operations have significantly impacted the subsurface of the Site. Contaminants of concern included petroleum hydrocarbons and VOCs in soil and soil vapor. On May 9, 2014 Andersen Environmental directed Optimal Technologies (Optimal) to perform soil vapor sampling and analysis in eight soil vapor boring locations. All analyses were performed via Modified EPA Method 8260B on a laboratory grade Hewlett Packard model 5890 Series II gas chromatograph equipped with a Hewlett Packard model 5971 Mass Spectra Detector and Tekmar LSC 2000 Purge and Trap. An SGE capillary column using helium as the carrier gas was used to perform all analysis. All soil vapor samples were analyzed on-site for VOCs by Modified EPA Method 8260B. A summary of soil vapor analytical results for VOCs are presented within the Phase II ESA Report (Appendix G:4 of this SCEA). No VOCs were detected in any soil vapor samples analyzed during this assessment; therefore VOCs in soil vapor do not pose a significant concern to the environment or human health within the areas investigated. Therefore, it is the opinion of Andersen Environmental that petroleum hydrocarbons in the locations sampled does not pose a significant threat to human health or the environment at this time. Based on results of this investigation, Andersen Environmental recommends no further assessment of Project Site features identified at this time in the areas investigated. **Therefore, with the incorporation of regulatory compliance measures, impacts relating to the release of hazardous materials would be less than significant.**

### Preliminary Subsurface Methane Gas Investigation

#### 1123-1161 South Main Street (Appendix G:5), dated November 29, 2018

The Project Site is developed with four commercial buildings and surface parking. The Project Site is located in the Los Angeles Downtown Oil Field. However, no oil wells exist at the Project Site, based on the review of the California Department of Conservation, Division of Oil, Gas and Geothermal Resources oil field map by GeoKinetics. GeoKinetics performed a methane gas investigation at the Project Site on November 9, 2018 and monitored the gas probes on November 12 and 14, 2018. The gas probe methane, oxygen, and carbon dioxide concentrations were measured in the field using a portable, methane specific, LANDTEC GEM2000-PLUS infra-red gas analyzer. A volume of gas equivalent to approximately ten times that of the ¼ -inch diameter polyethylene gas probe tube was extracted through the LANDTEC

GEM2000-PLUS during the monitoring process. Steady state readings were generally obtained after approximately two tubing volumes of gas had been extracted. The highest methane reading displayed in each instance was recorded.

### **Results**

There were no elevated soil gas pressure readings measured in any of the gas probes above 0.00 inches of water. As such, there was no indication of elevated soil gas pressures associated with methane generation or migration. The concentration of oxygen in the atmosphere at sea level is approximately 21%. The subsurface oxygen levels were found to be slightly depressed below typical atmospheric levels at each of the gas probe installations. The lowest subsurface oxygen level recorded at the site was 18.8% while the average oxygen concentration measured in the gas probes was approximately 19.6%. The average concentration of carbon dioxide in the atmosphere at sea level is approximately 0.03%. Subsurface carbon dioxide levels were slightly elevated above typical atmospheric levels in each of the gas probes. The highest carbon dioxide concentration measured at the site was 0.8% while the average carbon dioxide concentration measured in the gas probes was approximately 0.3%.

The slightly depressed subsurface oxygen levels and slightly elevated carbon dioxide levels suggest residual organic matter entrained within the near surface soils is being biodegraded under aerobic conditions. ***Based upon the measured methane levels and the corresponding soil gas pressures and the Certificate of Compliance for Methane Test Data, the property is classified as a Level I site with a Design Methane Pressure of 2 inches of water in accordance with LADBS guidelines. Compliance with LAMC Sections 91.7101 through 91.7109 (RCM-HAZ-2) would ensure any impacts from methane would be less than significant.***

### **Regulatory Compliance Measures**

**RCM-HAZ-1 Asbestos.** Due to the age of the building(s) being demolished, toxic and/or hazardous construction materials may be located in the structure(s). Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

**RCM-HAZ-2 Methane Mitigation System.** The Proposed Project shall provide a methane mitigation system as required by Table 71 in Section 2. Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code based on the Site Design Level I.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant Impact.** A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

There are no Los Angeles Unified School District schools or private schools within one-quarter mile of the Project Site. The nearest school to the Project Site is the 9<sup>th</sup> Street Elementary School, located approximately one mile from the Project Site at 835 Stanford Avenue. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. Since no schools are located within 500 feet or within one-quarter mile from the Project Site, the construction activities from the Proposed Project would not create a hazard to any nearby schools. Further, the proposed haul route exiting the Project Site to Sunshine Canyon Landfill and the Downtown Diversion would travel south along Main Street and west on 17<sup>th</sup> Street to the on-ramp to the I-10 Freeway. The haul route exiting the I-10 Freeway would exit the Convention Center/Los Angeles Street off-ramp and travel north along Main Street to the Project Site. The local haul routes would not pass by any nearby schools. **Therefore, construction impacts would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and impacts would be less than significant.**

Further, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements. The operational activities of the Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **Operational impacts would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school and impacts would be less than significant.**

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Less Than Significant Impact.** California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

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As stated previously, a Phase I ESA was prepared for the Project Site, by assessing environmental concerns of the multiple subject properties within the Project Site. The Phase I ESAs identified properties on the Project Site to be listed on the following databases: HAZNET, EDR US Historical Auto Station, LACDHS PHI, HIST UST, and CA FID UST. The Phase I ESAs determined that there are recognized environmental concerns associated with the Project Site. The Phase II ESA prepared for the Project Site determined that the subsurface soil samples taken at the Project Site do not pose a significant threat to human health or the environment; and no further assessment of the Project Site is required. Thus, the Project Site's listing on government databases as a hazardous materials site would not create a significant hazard to the public or environment. ***With compliance to mandatory state and federal regulatory compliance measures (RCM-HAZ-1 and RCM-HAZ-2, above, would ensure potential impacts would be less than significant.***

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project 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 Proposed 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 closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 12 miles southwest of the Project Site. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. ***Therefore, the Proposed would not result in a safety hazard for people residing or working in the Project area, and no impact is expected to occur.***

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is located not in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.<sup>65</sup> Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.<sup>66</sup> Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed

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<sup>65</sup> Los Angeles County Department of Public Works, *City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

<sup>66</sup> *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

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Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. **Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.**

- 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 a highly 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).<sup>67</sup> **Therefore, no impacts from wildland fires are expected to occur.**

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in combination with the related projects identified in Section 3, Project Description, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant with adherence to all applicable regulations and implementation of mitigation measures. Therefore, the Proposed Project would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. **Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials and implementation of appropriate mitigation measures, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.**

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<sup>67</sup> City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: <http://zimas.lacity.org>, accessed February 2019.



# 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following section summarizes and incorporates the reference information from the following report (contained in Appendix H to this SCEA):

- Sewer Capacity Availability Request (SCAR), 1123-1161 S. Main Street and 111 W. 12<sup>th</sup> Street, prepared by the Bureau of Engineering, dated May 23, 2019.

## **PROJECT-SPECIFIC IMPACTS**

### **a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less Than Significant Impact.** A project would normally have a significant impact on surface water quality if stormwater 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 State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the 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.

### ***Construction Impacts***

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the planning and

construction of development and redevelopment projects. ***As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 (see RCM-HYD-1 through RCM-HYD-4, below) would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.***

### ***Operational Impacts***

The Project Site is currently developed with four commercial/retail buildings and surface parking. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains located along Main Street and 12<sup>th</sup> Street and does not percolate into the groundwater table beneath the Project Site.<sup>68</sup> The Proposed Project would remain 100 percent impervious under proposed conditions, and would therefore continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater.<sup>69</sup>

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<sup>68</sup> City of Los Angeles, Bureau of Engineering, *Navigate LA*, website: <http://navigatela.lacity.org/navigatela/>, accessed February 2019.

<sup>69</sup> City of Los Angeles, *Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

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The Proposed Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve non-residential uses or include five or more residential units and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project Site shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques must be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). Development and redevelopment projects are required to prepare a LID Plan, which comply with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. For the remaining runoff that cannot feasibly be managed on-site, the Proposed Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.<sup>70</sup> Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.<sup>71</sup>

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing  $\frac{3}{4}$ -inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval

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<sup>70</sup> *City of Los Angeles Ordinance No. 183,833, 2015.*

<sup>71</sup> *City of Los Angeles Ordinance No. 183,833, 2015.*

## X. Hydrology and Water Quality

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and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.<sup>72</sup>

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. ***Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures (see RCM-HYD-5, below), operational water quality impacts would be less than significant with code compliance.***

### Regulatory Compliance Measures

**RCM-HYD-1 National Pollutant Discharge Elimination System General Permit.** Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

**RCM-HYD-2 Stormwater Pollution (Demolition, Grading, and Construction Activities).** Sediment carries with it other work-site pollutants such as pesticides, cleaning solvents, cement wash, asphalt, and car fluids that are toxic to sea life.

- Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.

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<sup>72</sup> City of Los Angeles, *Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

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- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

**RCM-HYD-3 Standard Urban Stormwater Mitigation Plan.** Prior to the issuance of a grading permit, the Project shall comply with the SUSMP and/or the Site Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works.

**RCM-HYD-4 Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

**RCM-HYD-5 Best Management Practices.** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

**b) 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.** 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 in Question X(a), the Project Site is 100 percent impervious, and would remain 100 percent impervious under proposed conditions. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site.

According to the Geotechnical Report (Appendix E.1 to this SCEA), groundwater was not encountered during exploration, conducted to a maximum depth of 60 feet below the existing grade. The historically highest groundwater level is at a depth of 115 feet below the ground

surface.<sup>73</sup> The Proposed Project does not propose any subterranean levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. **Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater would be less than significant.**

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;**

**Less Than Significant Impact.** A project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on the Project vicinity. The Proposed Project is an infill development project on a site that is currently fully developed and is 100% impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. As discussed above, the Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A SWPPP would be prepared and implemented in compliance with the requirements of the Construction General Permit and will identify construction BMPs to control erosion and siltation during construction activities. For Project operations, the Project Site would be 100 percent impervious and surface water runoff would be directed to existing storm drain infrastructure. Surface water runoff would be controlled through site design and engineering practices in accordance with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176) and the LID Ordinance (Ordinance No. 181,899), which would ensure the developed site does not contribute to substantial erosion or siltation off-site. **As such, impacts to erosion or siltation would be less than significant. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.**

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.** As stated above in response to Checklist Questions X(a) and (i), the Project Site is 100 percent impervious and would remain 100 percent impervious under proposed conditions. Surface water runoff under proposed conditions would comply with the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID Ordinance would

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<sup>73</sup> *Geotechnologies, Inc., Soils and Geology Issues, Proposed Mixed-Use Tower, 1123 through 1161 South Main Street, Los Angeles, California, January 6, 2020. (See Appendix E.1 of this SCEA).*

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ensure the Project Site is developed with BMPs designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Proposed Project as compared to the existing conditions. **Therefore, the Proposed Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and impacts associated with the potential for off-site flooding would be less than significant.**

- 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**

**Less Than Significant Impact.** 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 project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

As addressed above, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Surface water flows from the Project Site currently drain into a 36-inch reinforced concrete pipe running beneath 11<sup>th</sup> Street with catch basins at the corner of 11<sup>th</sup> Street and Main Street and the corner of 12<sup>th</sup> Street and Main Street. Following the development of the Proposed Project, runoff from the Project Site would be collected on the Project Site and directed towards existing storm drains in the Project vicinity that have adequate capacity. As discussed in response to Checklist Question X(c)(iii), above, compliance with the City's LID Ordinance would ensure the volume of post-development surface water runoff is reduced under the Proposed Project as compared to the existing conditions. Compliance with the LID Ordinance would also ensure BMPs are implemented to treat the quality of surface water runoff before being discharged into the stormdrain system. **Therefore, the Proposed Project would not 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 and impacts would be less than significant.**

- iv. **Impede or redirect flood flows?**

**No Impact.** A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area as mapped by the FEMA's Flood Insurance Rate Map. The Project Site is in a zone designated as Zone X, which signifies that the area is outside the 0.2% annual chance floodplain.<sup>74</sup> **The Project Site is an infill site and is located in an urbanized area. As no changes to the local drainage pattern would occur with implementation of the**

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<sup>74</sup> Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 06037C1617G, December 21, 2018, website: <https://msc.fema.gov/portal/>, accessed February 2019.



***Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows, and no impact would occur.***

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less Than Significant Impact.** The Geotechnical Investigation states that the Project Site does not lie within the mapped tsunami inundation boundaries. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Per the County of Los Angeles Flood and Inundation Hazards Map (Leighton, 1990), the Project Site lies within the potential mapped inundation boundaries of the Hansen and Sepulveda Reservoirs, should the dam retaining these reservoirs fail during a seismic event.<sup>75</sup> However, the California Division of Safety of Dams and the U.S. Army Corps of Engineers monitor these reservoirs to guard against the threat of dam failure. Therefore, the potential for the reservoirs to fail during a seismic event is considered low. The development of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. ***Therefore, development of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow and impacts would be less than significant impact.***

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less Than Significant Impact.** As specified above, the Proposed Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Proposed Project would not adversely impact a groundwater management plan because the Proposed Project would be developed with BMPs in compliance with the NPDES to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. As discussed above, the Proposed Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. ***Therefore, neither construction nor operation of the Proposed Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and a less than significant impact would occur.***

**Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area is served by the existing City storm drain system. Runoff from the development sites and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is

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<sup>75</sup> *Geotechnologies, Inc., Soils and Geology Issues, Proposed Mixed-Use Tower, 1123 through 1161 South Main Street, Los Angeles, California, dated January 6, 2020.*

## X. Hydrology and Water Quality

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likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site or the related project sites, since this part of the City is already fully developed with impervious surfaces and each project would be subject to the LID Ordinance, which would result in a reduction of surface water flows entering the storm drain as compared to existing conditions.

The Proposed Project and each related project would be required to implement a SWPPP and/or SUSMP. Under the requirements of the LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing  $\frac{3}{4}$  inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. ***Thus, cumulative water quality impacts would be less than significant.***

# XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

## PROJECT-SPECIFIC IMPACTS

### a) Physically divide an established community?

**No Impact.** A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. 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 Proposed Project.

The proposed Project Site is located within an urbanized area of the City of Los Angeles and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. No separation of uses or disruption of access between land use types would occur as a result of the Proposed Project. The Proposed Project would replace four commercial/retail buildings and surface parking lot with a 30-story mixed-use residential and commercial building. The surrounding land uses include a mix of commercial, office, light industrial, and mixed-use residential and commercial buildings. A mixed-use residential and commercial development is also planned adjacent to the Project Site, across Main Street. Thus, the Project vicinity contains mixed-use residential and commercial developments similar to the Proposed Project. No separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. **Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.**

**b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less Than Significant Impact.** A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD.

At the local level, the Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: Central City Community Plan area, the City Center Redevelopment Project area, the Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Downtown Parking District, the Downtown Adaptive Reuse Incentive Area, and the Los Angeles State Enterprise Zone. The Project Site is also within a TPA pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.<sup>76</sup> These documents guide development at the Project Site.

### **Regional Plans**

#### ***SCAQMD Air Quality Management Plan***

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. The Proposed Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section III, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the AQMP.

#### ***SCAG Regional Comprehensive Plan and Guide***

As discussed in Checklist Question VIII, GHG, above, the Project Site is located within the six-county region that comprises the SCAG planning area. As part of the State's mandate to reduce

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<sup>76</sup> City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: <http://zimas.lacity.org/>, accessed February 2019.

## XI. Land Use and Planning

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per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

The Proposed Project would be consistent with the goals and policies set forth in Connect SoCal, as the Proposed Project would redevelop a site that is currently developed with four commercial/retail buildings and would include the construction of a high-rise mixed-use residential and commercial building. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase residential and commercial opportunities within a High Quality Transit Area (HQT). Furthermore, as the Proposed Project would add 363 residential units and 12,500 square feet of commercial land uses to the community, generating a net increase of approximately 875 new residents and approximately 33 new employees,<sup>77</sup> the Proposed Project would be consistent with SCAG's future growth projections for the City of Los Angeles. As discussed in greater detail in Section XVII, Transportation below, the Proposed Project's VMT impact would be below LADOT's significance threshold for household and work related VMT. As such the Proposed Project's would result in a less than significant regional VMT impact.

### Local Plans

#### ***City of Los Angeles General Plan***

The Proposed 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 Use Element is comprised of 35 community plans.<sup>78</sup>

The Elements that would be most applicable to the Proposed Project are the Framework Element, the Mobility Plan, the Housing Element, and the Land Use Element. The Project Site is currently zoned C2-4D-O. The C2 zoning designation corresponds with the existing Regional Center Commercial Land Use Designation on-site. The C2 zone allows for commercial uses, including the Proposed Project's residential and commercial uses. The Project Site and neighboring properties are in a portion of the community plan, which accommodates multi-family

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<sup>78</sup> *City of Los Angeles Department of City Planning, General Plan Elements, website: [https://planning.lacity.org/GP\\_elements.html](https://planning.lacity.org/GP_elements.html), accessed March 2019.*

residential and commercial uses. The Proposed Project has been designed to comply with all applicable General Plan and zoning designations. The following section provides a consistency analysis of the Proposed Project with the Framework Element, Mobility Plan, Housing Element, and the Land Use Element.

**General Plan Framework Element**

The General Plan’s Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan’s Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City’s community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Central City Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The General Plan Framework Element provides a 2010 projection of 27,029 persons, 16,457 households, and 61,500 additional jobs. The Central City Community Plan anticipated a population and dwelling unit capacity of 27,212 persons and 14,398 dwelling units, respectively. The Central City Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit, which is discussed in more detail in Table 6.12, below. More specifically, the Proposed Project is consistent with the Los Angeles General Plan Land Use Element, which consists of the 35 Community Plan Area plans, of which the property is in the City Center Community Plan. Consistency with the Community Plan is further demonstrated below in Table 6.12.

**Table 6.12  
Project Consistency with Applicable Objectives and Policies of the Framework Element**

Objective / Policy	Project Consistency Analysis
<b>Land Use Chapter</b>	
<b>Goal 3A:</b> A physically balanced distribution of land uses that contributes towards and facilitates the City’s long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental	<b>Consistent.</b> The Proposed Project would include a 30-story mixed-use residential and commercial building that would front the commercial corridors along Main Street and 12 <sup>th</sup> Street. The Proposed Project would provide new commercial/retail uses and employment opportunities as well as potential customers to the surrounding existing businesses, which helps improve the competitiveness of the commercial area. Thus, the Proposed Project would support this objective. Further, compliance with regulatory compliance measures would ensure that the building maintains a safe, clean, attractive and lively environment during the Project’s construction and operation.

XI. Land Use and Planning

Objective / Policy	Project Consistency Analysis
justice and a healthful living environment, and achievement of the vision for a more livable city.	
<b>Objective 3.1:</b> Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	<b>Consistent.</b> The Proposed Project would include a variety of uses including multi-family residential and ground-floor commercial which would provide new opportunities for new businesses or the expansion or relocation of existing businesses; thus, increasing business opportunities and economy of Downtown.
<b>Policy 3.1.2:</b> Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses.	<b>Consistent.</b> The Proposed Project is located on an infill lot that is already adequately served by public infrastructure. The Project Site is readily accessed via Main Street and 12 <sup>th</sup> Street and is adequately supported by utilities (including water service, sewer service, electrical, and natural gas), and public services (such as police, fire, schools, and recreation/parks).(see Appendix H, Utilities and Service Provider Response Letters).
<b>Objective 3.2:</b> Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	<b>Consistent.</b> The Project Site is located in a Transit Priority Area as defined by CEQA. Additionally, the Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options, such as walking and biking. Thus, the location of the Proposed Project would reduce vehicles-per-miles traveled, promote alternatives to driving, and aim to improve air quality.
<b>Policy 3.2.2:</b> Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and carious densities of residential development within neighborhoods at appropriate locations.	<b>Consistent.</b> The Proposed Project includes the development of a mixed-used building consisting of multi-family residential units and commercial space. The Proposed Project incorporates aspects of a compact development by providing the proposed development on a previously developed commercial lot. The Proposed Project would provide ground-floor commercial space, which would serve the neighborhood and community.
<b>Policy 3.2.3:</b> Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use appropriate locations.	<b>Consistent.</b> The Proposed Project would encourage improved access and mobility by providing a mix of residential and commercial uses on a single site. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and the nearby multi-family residential developments. In addition, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project promotes the use of a variety of transportation options, including 195 on-site bicycle parking spaces, which includes walking, biking, and the use of public transportation.
<b>Objective 3.3:</b> Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	<b>Consistent.</b> The Proposed Project's population and employment growth would be well within the projected population and employment growth in SCAG's Connect SoCal for the City of Los Angeles, which is further discussed in Section XIV, Population and Housing. Additionally, the Proposed Project would promote a

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	pedestrian-oriented environment with options for public transportation. The Proposed Project would also include utility infrastructure and would update any infrastructure improvements, if necessary. Further, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety.
<p><b>Policy 3.3.4:</b> Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.</p>	<p><b>Consistent.</b> The Proposed Project would replace the existing commercial land uses with the development of a high-rise mixed-use residential and commercial building on a Project Site zoned C2-4D-O and has a General Plan land use designation of "Regional Center Commercial." The C2 zone allows for the proposed multi-family uses and commercial uses. The Proposed Project would develop a mixed-use development that would be visually compatible with the surrounding light industrial, commercial, residential, and office uses. Therefore, the Proposed Project would enhance the character of the surrounding mixed uses and be consistent with this policy.</p>
<p><b>Objective 3.4:</b> Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p><b>Consistent.</b> As stated above, the Proposed Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the Downtown Los Angeles area. The commercial uses on-site would further support the pedestrian activity along Main Street and 12<sup>th</sup> Street by providing ground-floor commercial uses that would front these major commercial corridors.</p>
<p><b>Policy 3.4.1:</b> Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, and (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevard, referred to as districts, centers, and mixed-use boulevard, in accordance with the Framework Long-Range Land Use Diagram.</p>	<p><b>Consistent.</b> As stated above, the Proposed Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the Proposed Project is within walking distance of services, retail stores, and employment opportunities in the Downtown Los Angeles area. The commercial uses on-site would further support the pedestrian activity along Main Street and 12<sup>th</sup> Street by providing ground-floor commercial uses that would front these major commercial corridors, which is characterized by a mix of office, entertainment, retail, and residential uses.</p>
<p><b>Goal 3C:</b> Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.</p>	<p><b>Consistent.</b> The Proposed Project would include multi-family residential units that would be available at market rate. Thus, the Proposed Project would be consistent with this goal.</p>
<p><b>Policy 3.7.4:</b> Improve the quality of new multi-family dwelling units based on the Standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.</p>	<p><b>Consistent.</b> The Proposed Project would redevelop a site that is currently occupied by four commercial/retail buildings with a mixed-use development including 363 residential units. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. The Standards in Chapter 5 include placing housing over ground floor storefronts along</p>



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	mixed-use corridors, which the Proposed Project is consistent with. The Proposed Project also places housing in close proximity to centers, corridors, and fixed transit, as recommended within the Chapter 5 Standards. Compliance with all applicable building code requirements would further ensure that the building maintains a safe, clean, and attractive environment during the Proposed Project's construction and operation.
<b>Goal 3D:</b> Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles' neighborhoods.	<b>Consistent.</b> The Proposed Project would promote a pedestrian-oriented environment by providing active commercial uses and multi-family residences with future residents would provide new foot traffic for the surrounding retail, restaurant, and commercial uses. The building's design and would enhance pedestrian activity in the area, especially within the downtown Los Angeles area.
<b>Policy 3.8.4:</b> Enhance pedestrian activity by the design and siting of structures in accordance with Chapter 5 Urban Form and Neighborhood Design policies of this Element and Pedestrian-Oriented District Policies.	<b>Consistent.</b> As discussed above, the Proposed Project would promote a pedestrian-oriented environment by providing active uses that would front Main Street and 12 <sup>th</sup> Street. Coordination with the Department of City Planning would ensure the Proposed Project would be attractively designed and landscaped.
<b>Goal 3F:</b> Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	<b>Consistent.</b> The Proposed Project would provide ground-floor commercial/retail spaces that would provide future and existing residents with job opportunities, additional entertainment, and culture.
<b>Objective 3.10:</b> Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	<b>Consistent.</b> The Project Site is currently zoned C2-4D-O with a Regional Center Commercial General Plan land use designation. The Proposed Project would provide commercial uses, including commercial/retail spaces that would provide future and existing residents with job opportunities. Thus, the proposed uses are consistent with the zoning and land use designations. Additionally, the new residents would provide new foot traffic for surrounding business, conventions, trade shows, and tourism. Further, the Proposed Project's commercial uses would support visitors to Downtown. The Proposed Project would be compatible with the character of the surrounding districts and foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the Downtown commercial area.
<b>Goal 4A:</b> An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.	<b>Consistent.</b> The Proposed Project's dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom, and three-bedroom units) and would be available at range of market rates. The Proposed Project would increase the housing choices available in Downtown Los Angeles. The additional 363 units will increase the housing supply in Downtown Los Angeles and help reduce upward pressure on housing costs.
<b>Objective 4.2:</b> Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	<b>Consistent.</b> The Proposed Project would provide 363 multi-family residential units in a Transit Priority Area and in a highly urbanized area of Downtown Los Angeles. The Proposed Project would be within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway

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	lines. Additionally, the Proposed Project would not encroach on any existing lower-density residential neighborhoods.
<p><b>Objective 5.2:</b> Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.</p>	<p><b>Consistent.</b> The Proposed Project’s mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is located in the highly urbanized Downtown Los Angeles area and is surrounded by a mix of retail, commercial, and entertainment services.</p>
<p><b>Objective 5.8:</b> Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</p>	<p><b>Consistent.</b> As discussed above, the Proposed Project is an infill development in a Transit Priority Area (defined by CEQA) and is within a major employment center. The Proposed Project would place residential units and ground-floor commercial space in a transit-rich and pedestrian-oriented area. Additionally, the Project Site is located within numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site’s location near mass transit and in walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation.</p>
<p><b>Goal 7G:</b> A range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City’s work force to both live and work in the City.</p>	<p><b>Consistent.</b> The Proposed Project’s dwelling units would be of different sizes and configurations (studios, one-bedroom, two-bedroom units, and three-bedroom units) and would be available at range of market rates. The Proposed Project would increase the housing choices available in Downtown Los Angeles. The additional units will increase supply and help reduce upward pressure on housing costs. Additionally, the Proposed Project’s mixed-use design would allow future residents the opportunity to work on-site. Further, the Proposed Project’s close proximity to public transportation would allow residents to live and work in the City.</p>
<p><b>Objective 7.2:</b> Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.</p> <p><b>Policy 7.2.3:</b> Encourage new commercial development in proximity to rail and bus transit corridors and stations.</p>	<p><b>Consistent.</b> The Proposed Project would redevelop a site that is currently occupied by four commercial/retail buildings with the development of a high-rise mixed-use residential and commercial building, which would provide new commercial space for businesspersons in Los Angeles for the existing surrounding community. The Project Site is also directly served by multiple buses (refer to Section II, Project Description for description of public transportation serving the Project Site). The Proposed Project would implement the following features to reduce energy demands and assure maximum environmental quality: proximity to mass transit, in-fill smart growth, and resource conservation. The Proposed Project would also implement project design features, regulatory compliance measures, and mitigation measures as applicable to assure maximum feasible environmental quality.</p>
<p><i>Source: City of Los Angeles Department of City Planning, Framework Element, December 11, 1996.</i></p>	

### ***Mobility Plan 2035 of the General Plan***

The Mobility Plan 2035 (“Mobility Plan”) of the City of Los Angeles General Plan, amendment adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City’s high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Proposed Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households are have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035; and
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035. The Mobility Plan 2035 identifies Main Street as part of the Bicycle Lane Network. Main Street is classified as a Tier 1 Protected Bicycle Lane. Additionally, 11<sup>th</sup> Street is located approximately 180 feet north of the Project Site and is also classified as a Tier 1 Protected Bicycle Lane.

The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. Several streets in the study area are included within the planned Neighborhood Enhanced Network, including Hill Street, 11<sup>th</sup> Street, and Pico Boulevard. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area. With respect to the Mobility Plan’s stated objectives, the Proposed Project would increase households within one mile to the Transit Enhanced Network, provide housing within one-half mile to high quality bicycling facilities, and increase the combined mode split of persons who travel by walking, bicycling or transit. As shown in Table 6.13, the Proposed Project would promote the goals of the Housing Element and the Mobility Plan. As such, the Proposed Project would be consistent with the Mobility Plan.

**Table 6.13  
Project Consistency Analysis with Applicable Goals of the Mobility Plan**

City of Los Angeles General Plan Goals	Project Consistency Analysis
<b>Mobility Plan Key Goals</b>	
(1) Safety First: Crashes, speed, protection, security, safety education, and enforcement.	<b>Consistent.</b> The Proposed Project would not include unusual or hazardous design features. The Project Site is generally pedestrian-oriented. Primary vehicular access for the mixed-use building would be provided via a full-access driveway along Main Street and the adjacent alleyway. Additional entrance-only and exit-only driveways would also be located along the adjacent alleyway. The Proposed Project does not include any hazardous design features, which could impede emergency access. The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety. Therefore, the Proposed Project would not substantially increase hazards due to design features, or incompatible uses, and would not hinder this goal.
(2) World Class Infrastructure: Design, Complete Streets Network (walking, bicycling, transit, vehicles, goods movement), Bridges, Highways, Smart Investments.	<b>Consistent.</b> This goal is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project Site's location near mass transit, walking distance to services, retail stores, and employment opportunities, and the availability of bike parking located on the Project Site promotes a variety of transportation options. Thus, the Proposed Project would promote this goal.
(3) Access for All Angelenos: Affordability, vulnerable users, land use, operations, reliability, demand management, community connections.	<b>Consistent.</b> The Project Site is located in a highly urbanized area of Downtown Los Angeles within a TPA. The Proposed Project would develop new residential and commercial uses in walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this goal.

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<p>(4) Clean Environments and Healthy Communities Environment, public health, clean air, clean fuels and fleets.</p>	<p><b>Consistent.</b> The Proposed Project is an infill development within a TPA and is within a major employment center. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Sections III. Air Quality and VIII. Greenhouse Gas Emissions, operational emissions and greenhouse gas emissions generated by the Proposed Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD and therefore, the Proposed Project would be consistent with this goal.</p>
<p>Sources: City of Los Angeles General Plan Elements, Mobility Plan 2035. Parker Environmental Consultants, 2019.</p>	

**General Plan Housing Element**

The Proposed Project's general consistency with the applicable objectives and policies that support the goals set forth in the Housing Element is discussed in detail in Table 6.14, below. The Proposed Project would be generally consistent with the applicable objectives and policies in the Housing Element. The Project would provide 363 new residential units that would add to the Citywide housing supply. The Proposed Project would be a mixed-use development that would include new jobs associated with retail and restaurant uses that would be accessible to Metro local and rapid bus lines. In addition, the Proposed Project would promote and facilitate reduction of water consumption through the use of water saving and energy saving devices such as low-flow plumbing and fixtures. Finally, the Proposed Project would be an infill development within close proximity to many services, job opportunities, and public transit. Therefore, the Proposed Project would not conflict with applicable goals, policies, and objectives of the Los Angeles General Plan Housing Element.

**Table 6.14  
Project Consistency Analysis with Applicable Goals of the Housing Element**

City of Los Angeles General Plan Goals	Project Consistency Analysis
<b>Housing Element Goals</b>	
<p>a) A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.</p>	<p><b>Consistent.</b> The Proposed Project would increase the housing stock in Downtown Los Angeles by providing safe, attractive, and centrally located studios, one-bedroom, two-bedroom, and three-bedroom residential dwelling units. The proposed 363 residential units would be available to all persons without discrimination. Thus, the Proposed Project is contributing to the range of housing choices available in Downtown Los Angeles and is therefore consistent with this goal.</p>

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<p>b) A City in which housing helps to create safe, livable and sustainable neighborhoods.</p>	<p><b>Consistent.</b> The Proposed Project would redevelop a site that is currently occupied by four commercial/retail buildings. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with all applicable building code requirements would further ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Proposed Project would prevent the spread of blight and deterioration by redeveloping an underutilized site. The Proposed Project is therefore consistent with this goal.</p>
<p>c) A City where there are housing opportunities for all without discrimination.</p>	<p><b>Consistent.</b> The Proposed Project would provide a variety of dwelling units of different sizes and configurations that would be available at market rate. The Proposed Project is increasing the housing choices available in Downtown Los Angeles. The Proposed Project's housing opportunities would be available to all persons, without discrimination. Therefore, the Proposed Project would be consistent with this goal.</p>
<p><i>Sources: City of Los Angeles General Plan Elements, Housing Element 2013-2021, Chapter 6, Housing Goals, Objectives, Policies and Programs. Parker Environmental Consultants, 2019.</i></p>	

**Land Use Element: Central City Community Plan**

The Project Site is located within the South Park neighborhood sub-area of the Central City Community Plan Area. Therefore, all development activity on-site is subject to the land use policies of the Central City Community Plan (Community Plan). The Community Plan goals and objectives include providing organized growth, a Central City identity, and a full range of housing choices for employees and residents in the downtown area.

The Proposed Project would revitalize the area with the development of a 30-story mixed-use residential and commercial building with 363 dwelling units and 12,500 square feet of commercial space. The Proposed Project's dwelling units mix would consist of 122 studios, 133 one-bedroom units, 96 two-bedroom units, and 12 three-bedroom units. The Proposed Project would also provide a total of 373 automobile parking spaces and 195 bicycle spaces. The Proposed Project would provide a variety of on-site amenities, which would be located throughout the ground-floor lobby area, Level 5 amenity area, and roof deck. A detailed analysis of the consistency of the Proposed Project with the applicable objectives and policies of the Central City Community Plan for Residential and Commercial Land Uses is presented in Table 6.15, below.

**Table 6.15  
Project Consistency with Applicable Objectives and Policies of the Central City  
Community Plan Land Use Element for Residential and Commercial Land Uses**

Objective / Policy	Project Consistency Analysis
<b>Residential</b>	
<b>Objective 1-1:</b> To promote development of residential units in South Park.	<b>Consistent.</b> The Proposed Project would include 363 multi-family dwelling units in the South Park district of Downtown, Los Angeles. Thus, the Proposed Project supports this objective.
<b>Policy 1-1.1:</b> Maintain zoning standards that clearly promote housing and limit ancillary commercial to that which meets the needs of neighborhood residents or is compatible with residential uses.	<b>Consistent.</b> The Proposed Project promotes residential land uses in South Park. The Project Site is zoned C2-4D-O with a land use designation of Regional Center Commercial, which allows for a mixed-use residential and commercial development. The Proposed Project would be developed in accordance with the current zoning and land use designation. The Proposed Project would add 363 multiple family residential units and would include 12,500 square feet of limited ancillary neighborhood commercial uses. Thus, the Proposed Project would be consistent with this policy.
<b>Objective 1-2:</b> To increase the range of housing choices available to Downtown employees and residents.	<b>Consistent.</b> The Proposed Project would increase the housing stock in Downtown Los Angeles with 363 residential units, which consist of safe, attractive, and centrally located studios, one-bedroom, two-bedroom, and three-bedroom units. The units would be available to existing Downtown employees and residents. Thus, the Proposed Project would contribute to the range of housing choices available to Downtown employees and residents.
<b>Policy 1-3.1:</b> Encourage a cluster neighborhood design comprised of housing and services.	<b>Consistent.</b> The Project Site is located in a Transit Priority Area and in a highly urbanized area of Downtown Los Angeles. The Proposed Project would be within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is in close proximity to many public transportation options, including bus and subway lines. The Project Site's proximity to the Pico Rail Station, approximately 0.6 mile west, and the 7 <sup>th</sup> Street / Metro Center Station, approximately 0.9 mile north, 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-quarter mile) of the Project include (2/302, 4, 10, 14, 37, 30/330, 33, 35, 38, 40, 45, 48, 55/355, 66, 70, 71, 76, 78, 79/378, 83, 90/91, 92, 94, 96, 733, 745, 770, and 794). The LADOT DASH line (DASH Downtown E) runs along Los Angeles Street, with the nearest bus stop located at E. 11 <sup>th</sup> Street. Thus, the Proposed Project supports the cluster neighborhood design concept of including residents near neighborhood facilities.
<b>Commercial</b>	
<b>Objective 2-1:</b> To improve Central City's competitiveness as a location for offices, business, retail, and industry.	<b>Consistent.</b> The Proposed Project includes 12,500 square feet of ground-floor commercial/retail uses that would front Main Street and 12 <sup>th</sup> Street. The Proposed Project would provide new opportunities for new businesses or the expansion or relocation of existing

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	<p>businesses; thus, increasing business opportunities Downtown. Additionally, the Project Site is within walking distance of the Broadway Theater and Commercial District and the Spring Street Financial District. Although the Project Site is not located within these districts, the Proposed Project would be compatible with the character of these districts and foster new business and employment opportunities and potential customers, which helps improve the competitiveness of the Downtown commercial area. Thus, the Proposed Project would support this objective.</p>
<p><b>Policy 2-1.2:</b> To maintain a safe, clean, attractive, and lively environment.</p>	<p><b>Consistent.</b> Compliance with all applicable building code requirements would ensure that the building maintains a safe, clean, attractive and lively environment during the Project's construction and operation. Thus, the Proposed Project would be consistent with this policy.</p>
<p><b>Objective 2-2:</b> To retain the existing retail base in Central City.</p>	<p><b>Consistent.</b> The Project Site is currently developed with four commercial/retail buildings. The Proposed Project would develop 12,500 square feet of ground-floor commercial/retail fronting Main Street and 12<sup>th</sup> Street, which would provide new opportunities for new businesses or the expansion or relocation of existing businesses. Additionally, the Proposed Project would add approximately 875 residents to the Central City area. These new residents would likely be new customers that would support nearby local businesses. Thus, the Proposed Project would be consistent with this objective.</p>
<p><b>Policy 2-2.1:</b> Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force and businesses.</p>	<p><b>Consistent.</b> The Proposed Project includes ground-floor commercial space fronting Main Street and 12<sup>th</sup> Street. As such, the Proposed Project provides new space and opportunities that can attract businesses Downtown. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><b>Policy 2-2.2:</b> To encourage pedestrian-oriented and visitor serving uses during the evening hours especially along Grand Avenue cultural corridor between the Hollywood Freeway (US 101) and Fifth Street, the Figueroa Street corridor between the Santa Monica Freeway (I-10) and Fifth Street and Broadway between Third Street and Ninth Street.</p>	<p><b>Consistent.</b> The Proposed Project would introduce new permanent residents and provide ground-floor commercial/retail. The Project Site is in walking distance from many services, employment opportunities, and retail spaces in the Downtown Los Angeles area. Thus, the Proposed Project would encourage a pedestrian-oriented development that would support activities and uses into the evening hour. Although the Proposed Project is not located on Grand Avenue, Figueroa Street, Fifth Street or Broadway, the Proposed Project would support the intent of this policy.</p>
<p><b>Policy 2-2.3:</b> Support the growth of neighborhoods with small, local retail services.</p>	<p><b>Consistent.</b> The Proposed Project would include 12,500 square feet of neighborhood serving ground-floor commercial/retail spaces fronting Main Street and 12<sup>th</sup> Street. Thus, the Proposed Project would add local retail services to support and the growth of the South Park neighborhood. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><b>Objective 2-3:</b> To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.</p>	<p><b>Consistent.</b> The Proposed Project would be consistent with the surrounding neighborhood by adding a mixed-use development to an area that is characterized by mixed-use development. The building's design and ground-floor commercial/retail spaces would enhance pedestrian activity in the area, especially within the Downtown area.</p>



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	The ground-floor commercial/retail space will address the needs of visitors to Downtown who are travelling for business, conventions, trade shows, and tourism. Thus, the Proposed Project would support this objective.
<b>Objective 2-4:</b> To encourage a mix of uses which creates an active, 24-hour downtown environment for current residents and which would also foster increased tourism.	<b>Consistent.</b> The proposed mixed-use development would contribute and support this objective by adding new residents and ground-floor commercial/retail spaces. The Proposed Project would be designed to enhance pedestrian activity with the retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. These features, among others, would contribute to an active, 24-hour downtown environment. Thus, the Proposed Project would be consistent with this objective.
<b>Policy 2-4.1:</b> Promote nightlife activity by encouraging restaurants, pubs, night clubs, small theaters, and other specialty uses to reinforce existing pockets of activity.	<b>Consistent.</b> The Proposed Project includes ground-floor commercial/retail spaces fronting Main Street and 12 <sup>th</sup> Street. The commercial and retail uses would create an existing pocket of activity which would support and promote nightlife activities. The Proposed Project would be designed to enhance pedestrian activity with the commercial and retail stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Proposed Project would reinforce and add to the attraction of these pockets of activity by adding new residents to the area. Thus, the Proposed Project is consistent with this policy.
<i>Source: City of Los Angeles, Central City Community Plan, Land Use and Planning Element, 2003. Parker Environmental Consultants, 2019.</i>	

**Redevelopment Plan for the City Center Redevelopment Project Area**

Development on the Project Site is further defined by the Redevelopment Plan for the City Center Redevelopment Project (“Redevelopment Plan”). Due to State legislation, the CRA/LA has since been disbanded and there is a successor agency to the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Pursuant to City Ordinance 183,325 (effective November 11, 2019), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the City. Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in May 2002 by the CRA/LA and remains effective until May 2032. Specific design considerations from the Redevelopment Plan include: height, development densities, building setbacks, signage, open space and privacy, utilities, parking, and loading facilities. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the City Center area. The City Center area encompasses much of Historic Downtown, City Markets, and South Park development area.

The Proposed Project is located within the South Park Development area of the City Center Redevelopment Project area, which was established by the CRA/LA. The Redevelopment

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Plan’s objective for the South Park Development area is to achieve a mixed-use live/work community, consisting of a housing-commerce community featuring open space.<sup>79</sup> The Proposed Project is compatible with other existing and approved high-density housing and mixed-use projects located within the downtown area. The Redevelopment Plan and “D” limitation limit the total floor area of the Project Site to a ratio of 6:1; the Proposed Project is requesting a TFAR to allow for a total FAR of 7.03:1. Table 6.16, below, provides a detailed analysis of the consistency of the Proposed Project with the applicable objectives of the Redevelopment Plan.

The Proposed Project is also subject to Section 501 of the Redevelopment Plan (General Controls and Limitations), which requires that all structures comply with Federal, State, and Los Angeles City laws in effect, including the City building codes and ordinances (Redevelopment Plan, pg. 16). The Proposed Project’s consistency with the objectives in the Redevelopment Plan is further analyzed in Table 6.16, below.

The Redevelopment Plan designates the Project Site as commercial. The Redevelopment Plan establishes five criteria for residential uses within commercial areas, which includes mixed-use commercial and residential in a commercial zone. These criteria are:

1. Promote community revitalization;
2. Promote the goals and objectives of the Plan;
3. Be compatible with and appropriate for the Commercial uses in the vicinity;
4. Include amenities which are appropriate to the size and type of housing units proposed; and
5. Meet design and location criteria required by the Community Redevelopment Agency.

**Table 6.16  
Project Consistency with Applicable Objectives of the Redevelopment Plan**

Objective	Project Consistency Analysis
<ul style="list-style-type: none"> <li>• To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would redevelop an underutilized site that is currently used for commercial/retail uses and would develop a Project that maintains commercial/retail uses while also providing residential uses. The Proposed Project would be attractively designed and landscaped in accordance with the design guidelines of the Downtown Design Guide. Compliance with all applicable building code requirements would further ensure that the building maintains a safe, clean, and attractive environment during the Proposed Project’s construction and operation. As such, the Proposed Project would prevent the spread of blight and deterioration by redeveloping an underutilized site in accordance with the Plan. The Proposed Project would be consistent with this objective.</p>

<sup>79</sup> *City of Los Angeles, Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, 2002.*

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<ul style="list-style-type: none"> <li>To further the development of Downtown as the major center of the Los Angeles metropolitan region, within the context of the Los Angeles General Plan as envisioned by the General Plan Framework, Concept Plan, City-wide Plan portions, the Central City Community Plan, and the Downtown Strategic Plan.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would be designed and developed with the guidance of City Planning Staff and the applicable plans. Therefore, the Proposed Project would further the goals of the Los Angeles General Plan, Framework Element, the Central City Community Plan, and the Downtown Strategic Plan. Thus, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To create an environment that will prepare, and allow, the Central City to accept that share of regional growth and development which is appropriate, and which is economically and functionally attracted to it.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would replace underutilized commercial uses and surface parking lot and introduce new multi-family dwelling units and commercial/retail uses in the area, which would accommodate an increase of population and housing. Nevertheless, the Proposed Project housing and population generation is consistent with SCAG's growth projections for the City of Los Angeles Subarea. Additionally, the Proposed Project would be consistent with the City's goals of increasing housing in transit-rich areas near services, retail, and employment opportunities to reduce vehicle-miles traveled; increasing safe and healthy housing options downtown; and increasing the diversity of the housing stock. Therefore, the Proposed Project is consistent with Central City development goals and growth projections and would not hinder the implementation of this objective.</p>
<ul style="list-style-type: none"> <li>To promote the development and rehabilitation of economic enterprises including retail, commercial, service, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would provide ground-floor commercial/retail fronting Main Street and 12<sup>th</sup> Street, which would increase employment opportunities within Downtown and contribute to the Project Area's tax base. Thus, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would be consistent with this objective since it proposes the development of an underutilized site that is currently used for commercial/retail purposes. The Proposed Project would be designed with the guidance of applicable plans and design guidelines. Therefore, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.</li> </ul>	<p><b>Consistent.</b> The Proposed Project would provide 363 new residential units and 12,500 square feet of ground-floor commercial/retail space. Additionally, the Proposed Project would be designed to promote pedestrian activity with the commercial stores' main entrances fronting the public right-of-way and providing night-time lighting for enhanced security. The Proposed Project's location near mass transit and within walking distance to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Thus, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To create a symbol of pride and identity which gives the Central City a strong</li> </ul>	<p><b>Consistent.</b> Development of the Project Site is guided by the Redevelopment Plan, Central City Community</p>

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<p>image as the major center of the Los Angeles region.</p>	<p>Plan, and the Downtown Design Guide. The Proposed Project would be consistent with this objective and preserve and contribute to the area’s symbol of pride and identity by introducing an iconic residential and commercial development that would be consistent with the Downtown Design Guidelines. Therefore, the Proposed Project furthers the goals of this objective.</p>
<ul style="list-style-type: none"> <li>To facilitate the development of an integrated transportation system which will allow for the efficient movement of people and goods into, through, and out of the Central City.</li> </ul>	<p><b>Not Applicable.</b> This objective is directed towards City goals and does not specifically pertain to the Proposed Project. The Proposed Project would place new housing and commercial/retail space in a highly walkable and transit-rich area. As such, residents, guests, and employees of the Proposed Project can easily move around the Central City area and greater Los Angeles region. Therefore, the Proposed Project furthers the goals of this objective.</p>
<ul style="list-style-type: none"> <li>To achieve excellence in design, based on how the Central City is to be used by people, giving emphasis to parks, green spaces, streetscapes, street trees, and places designed for walking and sitting, and to develop an open space infrastructure that will aid in the creation of a cohesive social fabric.</li> </ul>	<p><b>Consistent.</b> The Downtown Design Guide directs the design of the Proposed Project. The Proposed Project would be consistent with the design and development goals of the Central City Community Plan area. As such, the Proposed Project would be attractively designed and landscaped. The Proposed Project would provide common open space to its residents and guests, which would reduce the Proposed Project’s demand on local parks and open space. By providing on-site open space and the payment of the park fee, the Proposed Project’s impacts on local parks would be less than significant. With development of the Project and payment of the park fee, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To develop and implement public art into the urban fabric, integrating art into both public and private developments.</li> </ul>	<p><b>Consistent.</b> The commercial component of the Proposed Project is subject to LAMC Section 91.107.4.6, which imposes an arts development fee for new development. The fees paid pursuant to this LAMC Section will be used to provide adequate cultural and artistic facilities, services and community amenities for the Proposed Project. Thus, the Proposed Project would be consistent with this objective.</p>
<ul style="list-style-type: none"> <li>To preserve key landmarks which highlight the history and unique character of the City, blending old and new in an aesthetic realization of change or growth with distinction, and facilitating the adaptive reuse of structures of architectural, historic or cultural merit.</li> </ul>	<p><b>Not Applicable.</b> This objective is not specifically applicable to the Proposed Project. However, the Project Site is currently used for commercial/retail uses, and no significant landmarks or structures exist on-site. As further discussed in the Section V, Cultural Resources, the Proposed Project would have a less than significant impact on identified surrounding historic resources and would not negatively affect the physical integrity of any historical resource. All of the identified historical resources in the vicinity of the Project Site would remain listed or eligible for listing under the relevant landmark program. The ability of these historical resources to convey their significance would not be materially impaired by the Proposed Project. As such, the Proposed Project would not destroy or demolish key landmarks and historical or unique features of the City and would not</p>

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	hinder the goals of this objective.
<ul style="list-style-type: none"> <li>To provide a full range of employment opportunities for persons of all income levels.</li> </ul>	<b>Consistent.</b> The Proposed Project would be consistent with this objective, as it provides ground-floor commercial/retail spaces and would introduce additional employment opportunities into the area.
<ul style="list-style-type: none"> <li>To provide high and medium density housing close to employment and available to all ethnic, social and economic groups, and to make an appropriate share of the City’s low- and moderate-income housing available to residents of the area.</li> </ul>	<b>Not Applicable.</b> This objective is not specifically applicable to the Proposed Project. However, the Proposed Project would locate high-density housing near many employment opportunities. Additionally, the 12,500 square foot ground-floor commercial element would generate additional employment opportunities for approximately 25 employees in the Downtown area. The Proposed Project’s residential units and employment opportunities would be available to all ethnic, social, and economic groups without discrimination. As such, the Proposed Project would not hinder the goals of this objective.
<ul style="list-style-type: none"> <li>To establish an atmosphere of cooperation among residents, workers, developers, business, special interest groups and public agencies in the implementation of this Plan.</li> </ul>	<b>Not Applicable.</b> This objective is directed toward City goals and is not specifically applicable to the Proposed Project.
<p><i>Notes:</i>            1. “Plan” used within this table means the City Center Redevelopment Plan.            Source: City of Los Angeles, Redevelopment Plan For the City Center Redevelopment Project (Ordinance No. 174593), May 15, 2002.            Parker Environmental Consultants, 2021.</p>	

The Proposed Project would be consistent with the criteria for residential uses in commercial areas. The Proposed Project would revitalize an underutilized site with the development of a high-rise mixed-use residential and commercial building. As demonstrated in Table 6.16, above, the Proposed Project would promote the goals and objectives of the Redevelopment Plan. The Proposed Project’s land uses are consistent with the surrounding neighborhood that is characterized by existing and proposed mixed-use buildings. As such, the Proposed Project would be compatible and appropriate for the commercial and multi-family land uses located in the vicinity of the Project Site. Additionally, the Proposed Project would be located in a highly walkable and transit-rich area to promote sustainable land use and growth patterns. Further, the Proposed Project would provide open space for the residents and would include amenities, which are appropriate to the size and type of housing proposed to achieve a well-designed modern, efficient and balanced urban environment. The Redevelopment Plan refers to the Downtown Design Guide for guidance in building design. The proposed building would be designed with the guidance of this document.

Section 512.1 of the Redevelopment Plan allows for a maximum FAR of 6 to 1 in the South Park Development Area. However, Section 512.4 allows for this FAR to be exceeded through TFAR. The Proposed Project requests a TFAR approval of less than 50,000 square feet for the total square footage of 343,447 square feet, which is allowed pursuant to the Redevelopment Plan

Section 512.4 and LAMC Section 14.5. Based on the Redevelopment Plan Section 512.4, TFAR resulting in higher density development must be appropriate in terms of location and access to the circulation system. TFAR to parcels with reasonable proximity or direct access to a public or private rapid transit station is also particularly encouraged. The Proposed Project is well served by transit and is within walking distance of numerous intersections with numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the Proposed Project would be consistent with the Redevelopment Plan's goal to promote higher density mixed-use development and its overall objectives.

***Downtown Design Guide: City of Los Angeles***

As discussed earlier, the application of Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." The Proposed Project is a mixed-use residential project on an infill site within a Transit Priority Area. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. The City's Downtown Design Guide has been adopted by the City to guide its design review of projects as part of Site Plan Review. The Proposed Project's consistency with such design guidelines is discussed below.

The Downtown Design Guide: City of Los Angeles encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public rights-of-way, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, public art, and promote civic and cultural life, which are discussed in further detail below. Additionally, the Downtown Design Guide identifies design principles for creating a livable downtown; these principles include:

- a) *Employment Opportunities.* Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of a sustainable Downtown.
- b) *Housing Choices.* Provide a range of housing types and price levels that offer a full range of choices, including home ownership, and bring people of diverse ages, ethnicities, household sizes and income into daily interaction.
- c) *Transportation Choices.* Enable people to move around easily on foot, bicycle, transit, or auto. Accommodate cars but fewer than in the suburbs and allow people to live easily without one.
- d) *Shops and Services Within Walking Distance.* Provide shops and services for everyday

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needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.

- e) *Safe, Shared Streets*. Design Streets not just for vehicles, but as usable outdoor space for walking, bicycling and visual enjoyment.
- f) *Gathering Places*. Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, that are combined with shops and services. Program places for events and gatherings.
- g) *Active Recreation Areas*. Provide adequate public recreational open space, including joint use open space, within walking distance of residents.
- h) *A Rich Cultural Environment*. Integrate public art and contribute to the civic and cultural life of the City.

The Proposed Project would redevelop an underutilized site in an area largely characterized by commercial, office, light industrial, multi-family residential, and mixed-use residential/commercial land uses. The Proposed Project includes the development of a high-rise mixed-use building that would contain residential units and ground-floor commercial/retail. The Proposed Project would increase employment opportunities with its ground-floor commercial component. The Proposed Project would also be increasing the concentration of employment opportunities downtown and placing residents within walking distance of many employment opportunities, shops, and services. The Proposed Project's location would reduce dependence on single-occupancy vehicles and promote walking and alternative transportation. The Proposed Project would directly increase housing choices in downtown Los Angeles. With approval of the discretionary requests, the Proposed Project would provide more than adequate open space and residential amenities. The Proposed Project may include but is not limited to, ground-floor lobby area, a podium and amenity level, and a roof terrace. Additionally, the Proposed Project would include commercial uses that would face toward the public right-of-way, which would promote a pedestrian environment, activate the sidewalk, and provide socializing opportunities. The Proposed Project would support the Downtown Design Guide's principles of on-site recreation opportunities and gathering places. The Proposed Project would directly support and promote the principles of the Downtown Design Guide.

Project Site access and driveway design would be designed and developed in consultation with the Los Angeles Department of Transportation, Department of Building and Safety, and the Los Angeles Fire Department, as required. The Proposed Project would provide ground-floor commercial uses that would front Main Street and 12<sup>th</sup> Street and would support a pedestrian-oriented environment, which would help support civic and cultural life. Ground-floor design and treatment (such as providing large storefront windows and beautifying the public right-of-way with street trees and landscaping) would promote pedestrian activity along Main Street and 12<sup>th</sup> Street. The Project Site would be well designed and landscaped and would further enrich the community identity within Downtown Los Angeles. Additionally, primary vehicular access for the residential and commercial uses would be provided via full-access driveways along Main Street and the adjacent alley, which would provide a connection to the parking garage. Additional

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entrance-only and exit-only driveways would also be located along the alleyway. Parking for the Proposed Project would be contained in the inner portions from the above-grade parking podium. The Proposed Project's building siting, parking and access, architectural design, and materials would support the Downtown Design Guidelines. Thus, the Proposed Project would support the applicable principles and design criteria of the Downtown Design Guide.

### **Los Angeles Municipal Code**

#### *Zoning and General Plan Land Use Designations*

The Project Site is located within the City of Los Angeles, which is subject to the requirements in the LAMC. The Project Site consists of approximately 48,908 square feet (1.12 acres). The Project Site is currently improved with four commercial/retail buildings. The Proposed Project includes the construction of a 30-story mixed-use residential and commercial building with 363 residential dwelling units and 12,500 square feet of ground floor commercial/retail space.

The Project Site is zoned C2-4D-O with a General Plan land use designation of Regional Center Commercial. The zones corresponding to the Regional Center Commercial designation include the CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4 zones.

The Proposed Project would be comprised of multi-family residential uses and neighborhood-serving commercial uses. Commercial and multi-family residential uses are permitted on lots zoned for C2 uses that are located within the Central City Community Plan Area and the City Center Redevelopment Project Area. With approval of discretionary requests, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

#### *Density*

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(c), the maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions of the LAMC so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. As such, under the Greater Downtown Housing Incentive, the density requirements and maximum unit per lot area requirements were eliminated. The Project Site would be developed with up to 363 residential units and no guest rooms. The proposed developed within be within the allowable FAR for the Project Site, as demonstrated below. Thus, the Proposed Project would be consistent with this requirement.

#### *Floor Area*

The Project Site is located within Height District 4. Height District No. 4 has no building height limit for the underlying zone but limits development to an FAR of 13:1. However, the "D" Classification limits FAR to a maximum of 6:1, or approximately 293,448 square feet based on lot area. The maximum FAR per the LAMC and the Redevelopment is 6:1, unless the Proposed Project is approved additional floor area through TFAR. The Proposed Project requests a TFAR approval of up to 49,999 square feet to allow for a total square footage of 343,447 square feet,



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which is permitted pursuant to the Redevelopment Plan Section 512 and LAMC Section 14.5. The addition of buildable floor area through the TFAR request would result in an FAR of 7.03:1. Thus, with approval of a TFAR request, the Proposed Project would be consistent with the allowable FAR.

### *Open Space*

As shown in Table 3.3 in Section 3, Project Description, the Proposed Project would be in compliance with the minimum open space requirements of the LAMC. The total amount of open space required by code is 39,600 square feet. The Proposed Project would include 39,601 square feet of open space. As part of the open space requirements, the residential component of the Proposed Project includes planting trees at a rate of one tree for every four dwelling units, which requires 91 trees. A total of 91 trees are proposed on-site, which is consistent with LAMC requirements. Thus, the Proposed Project would be consistent with the open space requirements of the LAMC.

### *Setbacks*

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(a), no yard requirements apply to lots that are located in the Greater Downtown Housing Incentive Area, except as required by the Downtown Design Guide. The Downtown Design Guidelines encourages variations in setbacks along street frontages. The Project Site has frontage along Main Street to the east and 12<sup>th</sup> Street to the south. The Proposed Project would provide an average 12-foot sidewalk fronting 12<sup>th</sup> Street with a two-foot dedication. As such, the Proposed Project would be consistent with the required setbacks and sidewalk easements.

### *Parking*

As discussed previously in this Section, the Proposed Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 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.” Accordingly, the Proposed Project’s parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099.

Parking for the proposed retail and residential uses on-site will be provided in the ground level and second level through fourth level above grade. The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A.4(p)), which permits one (1) space for each dwelling unit, except where there are more than six (6) dwelling units of more than three (3) habitable rooms per unit on any lot, the ratio of parking spaces required for all of such units shall be at least one and one-quarter (1¼) parking spaces for each dwelling unit of more than three (3) habitable rooms. A Zone Variance, pursuant to LAMC Section 12.27, is necessary to permit 100% of the parking stalls required for residential uses to be designed and maintained as compact stalls in lieu of standard spaces.

The Project Site is located in the Downtown Business Parking District (LAMC Section 12.21 A.4(i)), which states that for business, commercial or industrial buildings, having a gross floor area of 7,500 square feet or more, at least one parking space for each 1,000 square feet of floor area in said building, exclusive of floor areas used for automobile parking space, for basement storage, or for rooms housing mechanical equipment incidental to the operation of buildings.

Pursuant to LAMC Section 12.21.A.4, residential projects located within 1,500 feet of a major transit stop, may replace up to 15 percent of the required automobile parking spaces with bicycle parking. Additionally, non-residential projects located within 1,500 feet of a major transit stop may replace up to 30 percent of the required automobile parking spaces with bicycle parking. The Proposed Project would utilize a seven percent reduction in residential parking and 20 percent reduction in commercial parking spaces.

The Proposed Project would be consistent with the applicable parking requirements of the LAMC with approval of all entitlement requests. With the aforementioned parking reductions, the Proposed Project would require a total of 373 parking spaces, including 363 residential spaces and 10 commercial parking spaces. The Proposed Project plans to provide 373 parking spaces.

The Proposed Project would provide on-site bicycle parking and storage spaces for short-term and long-term bike storage. All short-term and long-term bike parking would be spread throughout the ground floor and parking levels near the service elevators and stairways. Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 23 short-term bicycle parking spaces and 172 long-term bicycle parking spaces, for a total of 195 bicycle parking spaces. The Project proposes to provide 195 spaces. Thus, the Proposed Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

#### *Downtown Adaptive Reuse Incentive Area*

The purpose of the Adaptive Reuse Ordinance is to facilitate the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units, or visitor-serving facilities. An adaptive reuse project is defined as any change of use to dwelling units, guest rooms, or joint living and working quarters in all or any portion of any eligible building. The Proposed Project would not rehabilitate any portion of the existing buildings on-site as the Proposed Project will demolish all four buildings, and as such the Proposed Project is not an adaptive reuse project. No further discussion is required with regards to the Adaptive Reuse Ordinance.

#### *Regional and Local Plan Consistency*

***As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site. With approval of discretionary requests and adherence to appropriate regulatory compliance measures, any impacts would be less than significant.***

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily 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 Proposed 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 Proposed Project together with future forecasted growth would not be anticipated to conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Central City community. Therefore, development of the Proposed Project together with the related projects would not be expected to result in cumulatively considerable impacts with respect to 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 Proposed Project would not combine with the related projects to substantially or adversely change the existing relationship with offsite communities and would not disrupt, divide, or isolate existing communities, the Proposed Project, combined with the related projects, would not result in cumulatively considerable physical land use impacts.***

## XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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 may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is zoned C2-4D-O, the "O" designation indicates the Project Site is located in an oil drilling district, specifically the Los Angeles Downtown Oil Field.<sup>80</sup> The Project Site is located within a Mineral Resources Zone 2 (MRZ-2).<sup>81</sup> However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with four commercial buildings. Development of the Project Site would not block or hinder access or availability of mineral resources. **Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and no impact would occur.**

<sup>80</sup> City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Oil field and oil drilling areas in the City of Los Angeles*, September 1996.

<sup>81</sup> City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles*, September 1996.

**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.** A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. Although the Project Site is located within a MRZ-2 zone, the Project Site is not currently used for the extraction of mineral resources. Historic research also shows that the Project Site has not been historically used for the extraction of mineral resources. Development of the Project Site would not block or hinder access or availability of locally important mineral resources. ***Therefore, no impact to locally important mineral resources would occur.***

**Cumulative Impacts**

**No Impact.** As discussed above, the Proposed would have no impact on mineral resources. It is not known if any of the related projects would result in the loss of availability of known mineral resources. Each related project would be required to comply with the Los Angeles CEQA guidelines and execute required project site studies. ***Nevertheless, the Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have no cumulative impact on mineral resources.***

# XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

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$L_{eq}$  – An  $L_{eq}$ , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the  $L_{eq}$  of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

$L_{max}$  – The maximum instantaneous noise level experienced during a given period of time.

$L_{min}$  – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average  $L_{eq}$  with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour  $L_{eq}$  would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem

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solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a rate of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.<sup>82</sup> Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.<sup>83</sup>

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<sup>82</sup> California Department of Transportation, *Division of Environmental Analysis, Technical Noise Supplement*, November 2009.

<sup>83</sup> Federal Transit Administration, *Office of Planning and Environment, Transit Noise and Vibration Impact Assessment*, May 2008.



*General Plan Noise Element*

As discussed previously, California Government Code Section 65302(g) requires that a noise element be included in the general plan of each county and city in the state. The Noise Element of the City's General Plan establishes CNEL guidelines for land use compatibility as shown in Table 6.17, below, and includes a number of goals, objectives, and policies for land use planning purposes. The overall purpose of the Noise Element of the City's General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of citizens to excessive noise levels. The following policies and objectives from the Noise Element of the General Plan are applicable to the Project.<sup>84</sup>

Objective 2 (Non-airport): Reduce or eliminate non-airport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3 (Land Use Development): Reduce or eliminate noise impact associated with proposed development of land and changes in land use.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

In accordance with the City's Noise Element, a noise exposure of 60 dBA CNEL or less is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dBA CNEL for noise-sensitive uses are generally considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dBA CNEL are normally unacceptable for residential uses.

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<sup>84</sup> *Noise Element of the General Plan, adopted February 3, 1999.*

**Table 6.17**  
**City of Los Angeles Community Noise Exposure Guidelines**

Land Use	Normally Acceptable <sup>a</sup>	Conditionally Acceptable <sup>b</sup>	Normally Unacceptable <sup>c</sup>	Clearly Unacceptable <sup>d</sup>
Single-family– Duplex– Mobile Homes	50 - 60	55 - 70	70 - 7–	above –5
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals,–Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

<sup>a</sup> *Normally Acceptable:* Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

<sup>b</sup> *Conditionally Acceptable:* New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

<sup>c</sup> *Normally Unacceptable:* New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

<sup>d</sup> *Clearly Unacceptable:* New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

### Los Angeles Municipal Code

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that regulate new construction activities. The City's comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum presumed ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC that are applicable to the Proposed Project are discussed below.

#### *SEC.41.40. Noise Due to Construction, Excavation Work—When Prohibited*

- (a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive

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drill, riveting machine, excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

#### *SEC 112.05 Maximum Noise Level of Powered Equipment or Powered Hand Tools*

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

- (a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- (b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;
- (c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

#### *SEC. 112.04 Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment, and Devices.*

- (b) Except as to the equipment and operations specifically mentioned and related elsewhere in this Chapter or for emergency work as that term is defined in Section 111.01(d), and except as to aircraft, tow tractors, aircraft auxiliary power units, trains and motor vehicles in their respective operations governed by State or federal

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regulations, no person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

#### *SEC.112.02. Air Conditioning, Refrigeration, Heating, Plumbing, Filtering Equipment*

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property ... to exceed the ambient noise level by more than five decibels.

#### *Ordinance No. 178,048*

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be posted on site that includes the job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Site, and City telephone numbers where violations can be reported. This notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

#### *SEC. 116.01. Loud, Unnecessary And Unusual Noise*

Notwithstanding any other provisions of this chapter and in addition thereto, it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The standard which may be considered in determining whether a violation of the provisions of this section exists may include, but not be limited to, the following: (a) The level of noise; (b) Whether the nature of the noise is usual or unusual; (c) Whether the origin of the noise is natural or unnatural; (d) The level and intensity of the background noise, if any; (e) The proximity of the noise to residential sleeping facilities; (f) The nature and zoning of the area within which the noise emanates; (g) The density of the inhabitation of the area within which the noise emanates; (h) The time of the day and night the noise occurs; (i) The duration of the noise; (j) Whether the noise is recurrent, intermittent, or constant; and (k) Whether the noise is produced by a commercial or noncommercial activity.

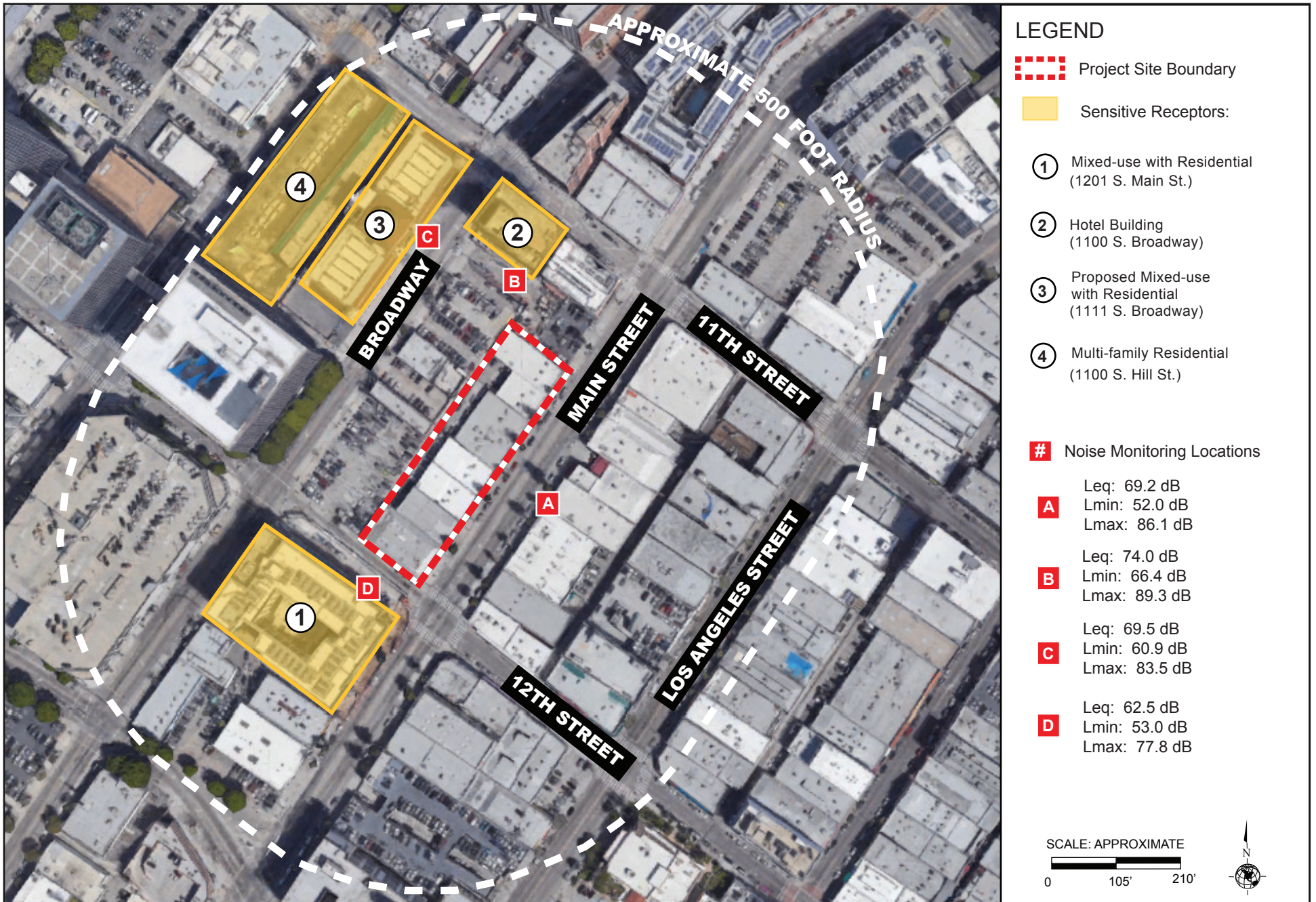
### **Ambient Noise Levels**

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 6.2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential and hotel uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Appendix I, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 6.18, Existing Ambient Noise Levels in Project Site Vicinity. As shown in Table 6.18, the ambient daytime noise in the vicinity of the Project Site ranges from 62.5 to 74.0  $L_{eq}$ . The maximum instantaneous noise level during the four 15-minute recordings was 89.3 dB  $L_{max}$  at Location B, where active construction was occurring by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic, including cars and buses, as well as active construction in the vicinity of the Project Site.

**Table 6.18**  
**Existing Ambient Noise Levels in the Project Site Vicinity**

No.	Location	Primary Noise Sources	Noise Level Statistics <sup>a</sup>		
			$L_{eq}$	$L_{min}$	$L_{max}$
A	On the east side of Main Street, between 11 <sup>th</sup> Street and 12 <sup>th</sup> Street	Moderate vehicle traffic, pedestrian traffic, buses, overhead planes	69.2	52.0	86.1
B	Along the southern border of Sensitive Receptor No.3	Vehicle traffic, pedestrian traffic, active construction of Sensitive Receptor No. 3	74.0	66.4	89.3
C	On the west side of Broadway, between 11 <sup>th</sup> Street and 12 <sup>th</sup> Street	Moderate vehicle traffic, light pedestrian traffic, buses, active construction on Sensitive Receptor No.4	69.5	60.9	83.5
D	On the south side of 12 <sup>th</sup> Street, between Broadway and Main Street	Light vehicle traffic, light pedestrian traffic	62.5	53.0	77.8

<sup>a</sup> Noise measurements were taken on Monday, April 1, 2019 between approximately 11:30 a.m. and 12:45 p.m. at each location for a duration of 15 minutes. See Appendix I of this SCEA for noise monitoring data sheets.  
Parker Environmental Consultants, 2019.



Source: Google Earth, Aerial View, 2019.

### ***Sensitive Receptors***

The surrounding land uses in the Project Site vicinity are generally office, commercial, and light industrial land uses, which are not considered sensitive to noise. Noise sensitive receptors are defined as: residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Several noise sensitive land uses are located in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified. Table 6.19 below provides a summary of the sensitive receptors by address and land use and their respective proximity to the Project Site.

**Table 6.19  
Summary of Noise Sensitive Land Uses within 500 Feet of the Project Site**

<b>ID</b>	<b>Address</b>	<b>Land Use / Description</b>	<b>Distance to Project Site</b>
1	1201 S. Main Street	Mixed-use building with multi-family residential	60 ft.
2	1100 S. Broadway	Hotel building	100 ft.
3	1111 S. Broadway	Proposed mixed-use building with multi-family residential	210 ft.
4	1100 S. Hill Street	Multi-family residential building	340 ft.

*Source: Parker Environmental Consultants, 2019.*

The locations of these land uses relative to the Project Site are depicted in Figure 6.2, Noise Monitoring and Sensitive Receptor Location Map.

### **PROJECT-SPECIFIC IMPACTS**

- 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.** A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

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For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 6.17, City of Los Angeles Community Noise Exposure Guidelines, to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a  $L_{eq}$  standard of 5 dBA over ambient conditions as constituting a LAMC violation.

#### **Construction Impacts**

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source.<sup>85</sup> However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Further, in compliance with LAMC Section 112.04, this analysis addresses whether construction activities would exceed existing ambient exterior noise levels by 5 dBA (hourly  $L_{eq}$ ) or more in residential areas.

Construction of the Proposed Project would require the use of heavy equipment for demolition and site preparation, the installation of utilities, paving, and building construction. Construction of the Proposed Project would occur in five separate phases, which would not include overlap of the usage of construction equipment. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. The Proposed Project’s construction noise levels were estimated using the noise prediction and reference noise levels for construction equipment usage by phase based on the Federal Highway Administration’s (FHWA) Roadway Construction Noise Model (RCNM, Version 1.1 (2006)). The average (hourly  $L_{eq}$ ) construction noise levels by phase are based on the quantity, type, and usage factors for the construction equipment anticipated to be used during each phase of construction. The predicted construction noise levels at each of the sensitive receptors were then estimated based on respective distance

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<sup>85</sup> As shown in Figure 3.2, Zoning and General Plan Land Use Designations, the properties surrounding the Project Site are zoned for Commercial (C2) or Light Industrial (M2). Thus, LAMC Section 112.05 is not applicable to the Proposed Project. Notwithstanding the C2 and M2 zone designations, the Proposed Project’s noise impacts upon adjacent residential land uses is addressed in this analysis in accordance with the LA CEQA Thresholds Guide.



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between the source and the receptor and other factors that would affect the noise levels such as intervening structures or barriers that provide sound attenuation.

Table 6.20, below, shows the estimated exterior construction noise levels at each of the five identified sensitive receptor locations. The Proposed Project’s construction noise levels at Sensitive Receptor Nos. 3 and 4 would be below the construction significance criteria of 5-dBA increase over the ambient noise levels, and thus would not be significantly impacted by the Proposed Project. Construction noise levels at Sensitive Receptor No. 1 and 2, however, would potentially be exposed to noise levels that exceed a 5-dBA increase over the ambient noise levels and thus could be significantly impacted. As such, Mitigation Measure N-4 would require the contractor to install a temporary noise barrier during construction to attenuate the Proposed Project’s construction noise levels by -20 dBA along the southern property line and a minimum of -6 dBA along the northern and eastern property lines. The performance standards specified in Mitigation Measure N-4 could be readily achieved with standard construction noise attenuation techniques and products such as plywood barriers and or chain link fencing wrapped with weatherproof noise insulating sound blankets.

Mitigation Measure N-4 would be capable of effectively attenuating construction noise produced by heavy equipment and activities on the ground level, but would not be effective in mitigating noise impacts during structural framing and architectural coating. As such, Mitigation Measure MM-N-5 requires the contractor to employ the use of temporary noise barriers to be placed at the source of noise sources on floors located above the first level to ensure noise levels are appropriately attenuated so as not to exceed a 5 dBA increase at nearby residential land uses. A noise reduction of 18 dBA would be sufficient to reduce construction noise levels from above

**Table 6.20  
Estimated Exterior Construction Noise at Nearest Sensitive Receptors**

ID	Address/Land Use	Existing Exterior Ambient Noise (dBA L <sub>eq</sub> )	Unmitigated Construction Noise Levels (dBA L <sub>eq</sub> ) <sup>a</sup>	Construction Noise Significance Criteria (dBA L <sub>eq</sub> ) <sup>b</sup>	Construction Noise Impact Above Threshold (dBA L <sub>eq</sub> )
1	1201 S. Main Street / Mixed-use with Residential	62.5	84.6	67.5	17.1
2	1100 S. Broadway / Hotel Building	74.0	81.1	79.0	2.1
3	1111 S. Broadway / Proposed Mixed-use with Residential	69.5	74.3	74.5	0.0
4	1100 S. Hill Street / Multi-family Residential	69.5	70.4	74.5	0.0

*Notes*  
<sup>a</sup> Unmitigated construction noise levels refer to the highest noise level of the five construction phases at each sensitive receptor. See RCNM Construction Noise Summary Worksheets in Appendix I.  
<sup>b</sup> Significance criteria is based on the ambient noise levels plus 5 dBA, pursuant to LAMC Section 112.04..  
Source: Roadway Construction Noise Model (RCNM), Version 1.1 (See Construction Noise Calculation Worksheets in Appendix I).

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grade noise sources during the building construction and architectural coating phases to below the thresholds of significance. As such, construction noise impacts would be less than significant after mitigation.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

As noted in Mitigation Measures MM-N-1 through MM-N-5, below, noise control efforts to limit the construction activities' hours of construction, incorporate noise shielding devices and sound mufflers and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. The Proposed Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Proposed Project. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays or any federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure MM-N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

#### **Regulatory Compliance Measures**

**RCM-N-1** The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

**RCM-N-2** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

**Mitigation Measures:**

- **Increased Noise Levels (Demolition, Grading, and Construction Activities)**

- MM-N-1** Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.
- MM-N-2** Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- MM-N-3** The project contractor shall use power construction equipment with noise shielding and muffling devices.
- MM-N-4** The project contractor shall erect a minimum 8-foot high temporary noise-attenuating sound barrier along the perimeter of the Project Site during construction. The sound barrier along the 12<sup>th</sup> Street frontage shall be designed to provide a minimum sound attenuation of -18 dBA at Sensitive Receptor #1 (the Axis Apartments Mixed-Use Building located at 1201 S. Main Street) and a minimum of 2.1 dBA at Sensitive Receptor #2 (the Proper Hotel located at 1100 S. Broadway).
- MM-N-5** During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

**Operational Noise**

*HVAC Equipment Noise*

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on the Project Site and in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project Site vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Based on estimated A-weighted noise ratings published for standard HVAC equipment,<sup>86</sup> sound

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<sup>86</sup> Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1 ½ to 5 Nominal Tons).

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power from rooftop mounted HVAC equipment would be expected to range from 69 dBA  $L_{eq}$  to 74 dBA  $L_{eq}$  at the source. Therefore, as a conservative estimate, a reference level of 74 dBA  $L_{eq}$  was utilized to analyze HVAC equipment noise levels. Based on the respective distances to the sensitive receptors the maximum noise level produced by the HVAC equipment, the highest anticipated noise level is approximately 38.77 dBA  $L_{eq}$ , which occurs at Sensitive Receptor No. 3. As this noise level is significantly below the ambient noise levels, the sound of HVAC equipment would not be audible at the neighboring sensitive receptors. **As such, noise from mechanical equipment would be less than significant.**

#### *5<sup>th</sup> Level Amenity Deck Noise*

The Proposed Project includes a total of 29,701 square feet of outdoor amenity space. The Proposed Project includes a main amenity deck on the 5<sup>th</sup> floor and a smaller outdoor amenity space on the roof level. The amenity deck on the 5<sup>th</sup> floor is proposed as a residential outdoor amenity space with a pool deck, basketball court, barbecue area, tables, and seating areas. An indoor amenity space is also proposed on the 5<sup>th</sup> floor, which includes a multipurpose room, private dining room, screening room, business center, recreation center, fitness rooms, and a reservable party room. The exterior 5<sup>th</sup> Floor residential amenity deck area is approximately 27,160 square feet and, based on an average occupancy load of 50 square feet per person, this space is anticipated to accommodate up to 543 persons (270 persons on the north terrace and 273 persons on the south terrace). The intended use of the amenity deck and outdoor courtyards would be to have the residents and guests to lounge outside and utilize the available amenities. The roof level amenity deck includes approximately 2,541 square feet of outdoor space with an estimated occupancy of 51 persons.

There is no objective criteria for analyzing outdoor human activities within amenity spaces (i.e., crowd noise). The only applicable criteria the LAMC code provides is LAMC Section 116.01, which states that it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended uses would violate the prohibition of “loud, unnecessary and unusual noise” criteria.

Based on the maximum occupancy loads of the outdoor spaces on the 5<sup>th</sup> level amenity deck and reference noise levels of 65 dBA and 62 dBA ( $L_{eq}$  at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, noise levels from these outdoor spaces were estimated at each of the respective sensitive receptors.<sup>87</sup> The combined noise levels from passive recreational activities on the outdoor amenity deck at the same time are summarized in Table 6.21, below. Noise levels from the courtyard activities would not exceed the 5-dBA threshold above ambient at any of the sensitive receptors. **Therefore, noise impacts associated with operational activities from the outdoor courtyards would be less than significant.**

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<sup>87</sup> Cyril M. Harris, *Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991.*

**Table 6.21**  
**Estimated Operational Noise Levels and Composite Noise Levels**

<b>ID#<sup>a</sup></b>	<b>Ambient Noise Level</b>	<b>Outdoor Decks Noise Level</b>	<b>HVAC Equipment Noise Level</b>	<b>Composite Noise Level</b>	<b>Significance Criteria (dBA L<sub>eq</sub>)</b>	<b>Significant Impact?</b>
1	62.50	65.14	38.09	67.03	67.50	NO
2	74.00	63.37	37.88	74.36	79.00	NO
3	69.50	59.28	38.77	69.90	74.50	NO
4	69.50	51.37	25.45	69.57	74.50	NO

<sup>a</sup> Refer to Table 6.18 for description of Sensitive Receptors.  
Source: Calculations based on Federal Transit Administration, *Transit Noise and Vibration Impact Assessment, Final Report, May 2006* and Caltrans' *Technical Noise Supplement, September 2013*. See Appendix I to this SCEA. Parker Environmental Consultants, 2021.

#### *Loading Dock / Trash Collection Noise*

The loading entrance for refuse trucks to enter the Project Site would be located along the adjacent alley running along the western perimeter of the Project Site. The Proposed Project includes an enclosed area within the ground floor for refuse and recycling collection that would block the line of site to surrounding sensitive receptors, therefore providing a sound-attenuating buffer between the noise source and the sensitive receptors. Noise from loading and trash collection would be temporary and occur only a few times a week. Additionally, the noise levels would be isolated within the parking structure levels, which would result in a less than significant noise impact to surrounding sensitive receptors, because noise from the parking structure levels would be entirely contained within the structure and would not be audible outdoors. As these sources would be entirely contained within the proposed parking structures, they would not contribute to the exterior ambient noise levels in the Project vicinity.

#### *Parking Structure Noise*

Operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels.

The primary full-access entrance to the parking garage would be from the adjacent alleyway on the western property line, and an additional full-access driveway along Main Street. Additional entrance-only and exit-only driveways to access the handicapped parking would be located along the alleyway. As discussed in Section 3, Project Description, the Proposed Project would provide 373 on-site parking spaces on the ground level and levels two through four above grade. Parking structures generate noise from vehicles engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the garage structure would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. Operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02

prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. **As such, noise impacts from the Proposed Project's parking areas would be less than significant.**

#### *Composite Noise Levels*

On-site noise sources associated with the Proposed Project would include mechanical HVAC equipment and outdoor amenity activities. Since parking noise would be completely enclosed, noise levels from these areas would not significantly increase ambient noise levels. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table 6.21, Estimated Operational Noise Levels and Composite Noise Levels, shows the noise levels from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. This analysis is conservative since these noise levels represent the maximum capacities in the amenity deck. **Therefore, the Proposed Project would not increase ambient noise levels by 5 dB, and a less than significant impact would occur.**

#### *Off-Site Traffic Noise*

The Proposed Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. Based on the principles of roadway noise, it would take a doubling of the roadway's traffic to generate a perceptible increase (3 dBA) in the ambient roadway noise volume. Thus, if a project would result in traffic that is less than double the existing traffic, then the Proposed Project's mobile noise impacts can be assumed to be less than significant. According to the Proposed Project's Transportation Study, the proposed development would result in a net increase of 463 net daily vehicle trips, including 69 AM peak hour trips and 40 PM peak hour trips. For purposes of analyzing the Proposed Project's traffic noise impacts, the traffic volumes at the two adjacent intersections analyzed in the Proposed Project's Transportation Study, Intersection No. 5: Main Street and 11<sup>th</sup> Street and Intersection No. 6: Main Street and 12<sup>th</sup> Street were analyzed. Per the Traffic Impact Study, it is estimated that approximately 8,620 daily trips occur at the intersection of Main Street and 11<sup>th</sup> Street and approximately 8,726 daily trips occur at the intersection of Main Street and 12<sup>th</sup> Street. The Proposed Project's estimated 463 average daily trips would represent a small percent increase in the daily traffic volume at these intersections. Therefore, the Proposed Project would not double the traffic along the closest intersections and thus would not exceed the 3-dBA CNEL threshold of significance at the nearby study intersections and roadways. **Thus, the Proposed Project's mobile source noise impact would be less than significant.**

#### **b) Generation of, excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak

particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

### **Construction Vibration**

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. 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 of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on FTA criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 6.22, below.

**Table 6.22  
Construction Vibration Damage Criteria**

Threshold Criteria	PPV (in/sec)	Approximate RMS velocity in decibels (VdB) (re 1 micro-inch/second)
<b>Building Category</b>		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
<i>Source: Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.</i>		

Table 6.23, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As mentioned above, each of the five construction phases would occur individually, with no overlap of the construction equipment between phases. As shown in Table 6.23, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

**Table 6.23  
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.</i>										

### Structural Vibration Impacts

For purposes of addressing construction-related vibration impacts on buildings, the City has not adopted any policies or guidelines relative to groundborne vibration impacts. Consequently, the FTA adopted vibration standards for buildings which were used to evaluate potential impacts related to Proposed Project construction. Based on FTA criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 6.23, above.



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There are no buildings immediately adjacent to the Project Site’s property lines. The Project Site is bordered by streets, an alleyway, and surface parking. As such, the Proposed Project’s construction activities would have no groundborne vibration impact to any surrounding structures. As such, the Proposed Project’s construction activities would have no groundborne vibration impact to any surrounding structures.

**Table 6.24  
Estimated Structural Vibration Damage Levels at Nearest Structures**

No.	Sensitive Land Use	Distance from Project Site (ft)	Estimated Vibration Levels (PPV in/sec)	Threshold of Significance <sup>a</sup>	Significant Impact?
1	Commercial buildings west of the Project Site, across the alley	12	0.17	0.3	No
<i>Source: Source: Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006. Parker Environmental Consultants, 2019.</i>					

**Operation**

The Proposed Project is a mixed-use development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) along Main Street, 12<sup>th</sup> Street and the alleyway, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, the collection of refuse is temporary and would occur within the enclosed parking structure which would effectively attenuate groundborne vibration and noise impacts. ***As such, vibration impacts associated with operation of the Proposed Project 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.** A significant impact may occur if the Proposed Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports or private air strips within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses. ***Therefore, the Proposed Project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.***

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The two closest related projects are Related Project No. 28, located immediately east of the Project Site, across Main Street, and Related Project No. 42, located immediately west of the Project Site, across the alleyway. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area and it is impossible to predict with any degree of certainty the occurrence of concurrent construction activities. However, it is possible that these related projects when coupled with the noise impacts of the Proposed Project, could result in a cumulatively significant noise impact. Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized and mitigated on a project-by-project basis. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced with feasible mitigation. As demonstrated above, Project construction noise impacts, with the implementation of Mitigation Measures MM-N-1 through MM-N-5, would result in less than significant impacts. ***As such, because each related project would be required to comply with the City's noise ordinance, cumulative impacts associated with construction noise would be mitigated to less than significant levels.***

# XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Error! Bookmark not defined.	<input checked="" type="checkbox"/>

**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 may occur if the Proposed Project would locate new development such as homes, businesses, 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 determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

In October 2008, SCAG approved and adopted the “2008 Regional Comprehensive Plan for the SCAG Region – Helping Communities Achieve A Sustainable Future” (2008 RCP). The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region’s land use, housing, economic, transportation, environmental, and overall quality of life needs. The 2008 RCP is intended to serve as an advisory document for local agencies in the SCAG region. The following vision statement and guiding principles are based on the region’s adopted Compass Growth Vision Principles for Sustaining a Livable Region. These statements further articulate how the RCP can promote and sustain the region’s mobility, livability, and prosperity for future generations.

*RCP Vision*

*To foster a Southern California region that addresses future needs while recognizing the interrelationship between economic prosperity, natural resource sustainability, and quality of life. Through measured performance and tangible outcomes, the RCP serves as both a voluntary action plan with short-term guidance and strategic, long-term initiatives that are guided by the following Guiding Principles for sustaining a livable region.*

*RCP Guiding Principles*

- *Improve mobility for all residents.* Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.
- *Foster livability in all communities.* Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.
- *Enable prosperity for all people.* Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.
- *Promote sustainability for future generations.* Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

**SCAG's Compass Growth Vision Strategy**

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the 2008 RCP, encourages better relationships between housing, transportation, and employment. The Growth Vision is driven by four key principles: (1) Mobility – Getting where we want to go, (2) Livability – Creating positive communities, (3) Prosperity – Long-term health for the region, and (4) Sustainability – Preserving natural surroundings. Additionally, the Compass Growth Vision incorporates a 2% Growth Strategy that will increase the region's mobility by:

- Putting new employment centers and new neighborhoods near major transit systems so that people can have transportation choices other than their cars.
- Designing safe, attractive transit centers and plazas that people enjoy using.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

**Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)**

On September 3, 2020, SCAG's Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) - a plan that the Regional

XIV. Population and Housing

Council now calls Connect SoCal. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Based on the regional growth projections in Connect SoCal, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). Employment within the City is expected to grow by 287,600 jobs, which is an approximate 16 percent increase in employment between 2016 and 2045. SCAG’s population, housing, and employment projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 6.25, below.

**Table 6.25  
SCAG Population and Housing Projections for the  
City of Los Angeles, Los Angeles County, and the SCAG Region**

<b>Population</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
<b>Households</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
<b>Employment</b>			
<b>Region</b>	<b>2016</b>	<b>2045</b>	<b>%Growth (2016-2045)</b>
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%
<i>Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.</i>			

The Proposed Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.77 million persons by 2045. As shown in Table 6.25, below, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19%

#### XIV. Population and Housing

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growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

#### **Construction Impacts**

Construction job opportunities created as a result of the Proposed Project are not expected to result in any substantial population growth in the Project area. 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.

Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Proposed Project, and as such, significant housing or population impacts would not result from construction of the Proposed Project. Therefore, construction-related population growth impacts would be less than significant.

#### **Operational Impacts**

The Project Site is currently developed with four commercial/retail buildings with a total of 28,110 square feet of floor area and a paved surface parking lot. The Proposed Project would include the demolition of the existing buildings on-site. The Proposed Project would result in the development of a 30-story mixed-use residential and commercial building with total of 363 dwelling units and 12,500 square feet of commercial/retail uses.

Population generation is shown in Table 6.26, and employee generation is shown in Table 6.26. It is estimated that the Proposed Project would generate approximately 875 residents and roughly 25 employees. Based on the City's current household demographics (e.g., an average of 2.41 persons per household for the Study Area), the construction of 363 additional dwelling units would result in an increase in up to approximately 875 net permanent residents in the City of Los Angeles.<sup>88</sup> The proposed increase in housing units and population would be consistent with the SCAG forecast of additional households and persons in the City of Los Angeles between 2016 and 2045.

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<sup>88</sup> *Based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database, the City of Los Angeles' citywide average population for multifamily housing is estimated to be 2.41 persons per household. (Jack Tsao, Data Analyst II, Department of City Planning Demographic Unit, June 12, 2020).*

**Table 6.26**  
**Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
<b>Project</b>			
Apartments	363 dwelling units	2.41 person / DU <sup>[a]</sup>	875
<b>Total Increase in Population</b>			<b>875</b>
<i>Note: DU = dwelling unit</i>			
<i><sup>[a]</sup> This estimate is based on the U.S. Census Bureau, American Community Survey (ACS) PUMS database. The City of Los Angeles citywide average population for multifamily housing is estimated to be 2.41 persons per household. (Jack Tsao, Data Analyst II, Department of City Planning Demographic Unit, June 12, 2020).</i>			

With respect to employment growth, it can be assumed that most of the jobs and employees generated by the Proposed Project would already reside within the City of Los Angeles. The additional employees generated by the Proposed Project would contribute to a fraction of one percent of SCAG's employment growth forecast for the City of Los Angeles. Thus, the increase in employment opportunities as a result of the Proposed Project is within SCAG's employment growth forecast. It can be assumed that most of the employees generated by the Proposed Project would already reside within the City of Los Angeles or County of Los Angeles. Thus, any population growth generated by the Proposed Project would be well within SCAG's population growth projections.

**Table 6.27**  
**Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees <sup>1</sup>
<b>Proposed Project</b>			
Commercial/Retail <sup>b</sup>	12,500 sf	2 employee / 1,000 sf <sup>[a]</sup>	25
<b>NET Total Project Employees</b>			<b>25</b>
<i>Note: sf = square feet</i>			
<i><sup>[a]</sup> The employee generation factor for commercial/retail uses were taken from the City of Los Angeles Department of Transportation VMT Calculator, Version 1.3, (See Appendix J.1, CEQA VMT Analysis, to this SCEA..</i>			

#### *Localized Growth Forecasts*

Table 6.25 shows the Southern California Association of Government's (SCAG) population and housing growth for the City of Los Angeles to the year 2045.

The Proposed Project's 363 new units, estimated 875 future residents, and roughly 25 employees would be well within SCAG estimates of growth for the City between 2016 and 2045.

Therefore, the Proposed Project would result in a less than significant impact with respect to population, housing, and employment growth.

Additionally, the Proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. **Therefore, impacts related to infrastructure 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 Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the development of a mixed-use residential and commercial building on a site that is currently occupied by four commercial/retail buildings and a paved surface parking lot. Therefore, no displacement of existing housing or residents would occur with the development of the Proposed Project. **Thus, the Proposed Project would not displace substantial numbers of people or housing and no impact would occur.**

**Cumulative Impacts**

**Less Than Significant Impact.** The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in Question XIV(a), the Proposed Project would not exceed the growth projections of SCAG's Connect SoCal plan for the City of Los Angeles subregion. Because the Proposed Project would not displace any residents, and population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in commercial land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial land uses. **As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.**



## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### PROJECT-SPECIFIC IMPACTS

The location of public services (including fire services, police protection services, parks, and libraries) in the Project vicinity and that service the Project Site shown in Figure 6.3, below.

#### a) Fire protection?

**Less Than Significant Impact.** A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. 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.<sup>89</sup> Moreover, in *City of Hayward v. Board of Trustees 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

<sup>89</sup> *City of Hayward et al. v. Board of Trustees of the California State University* (2015).

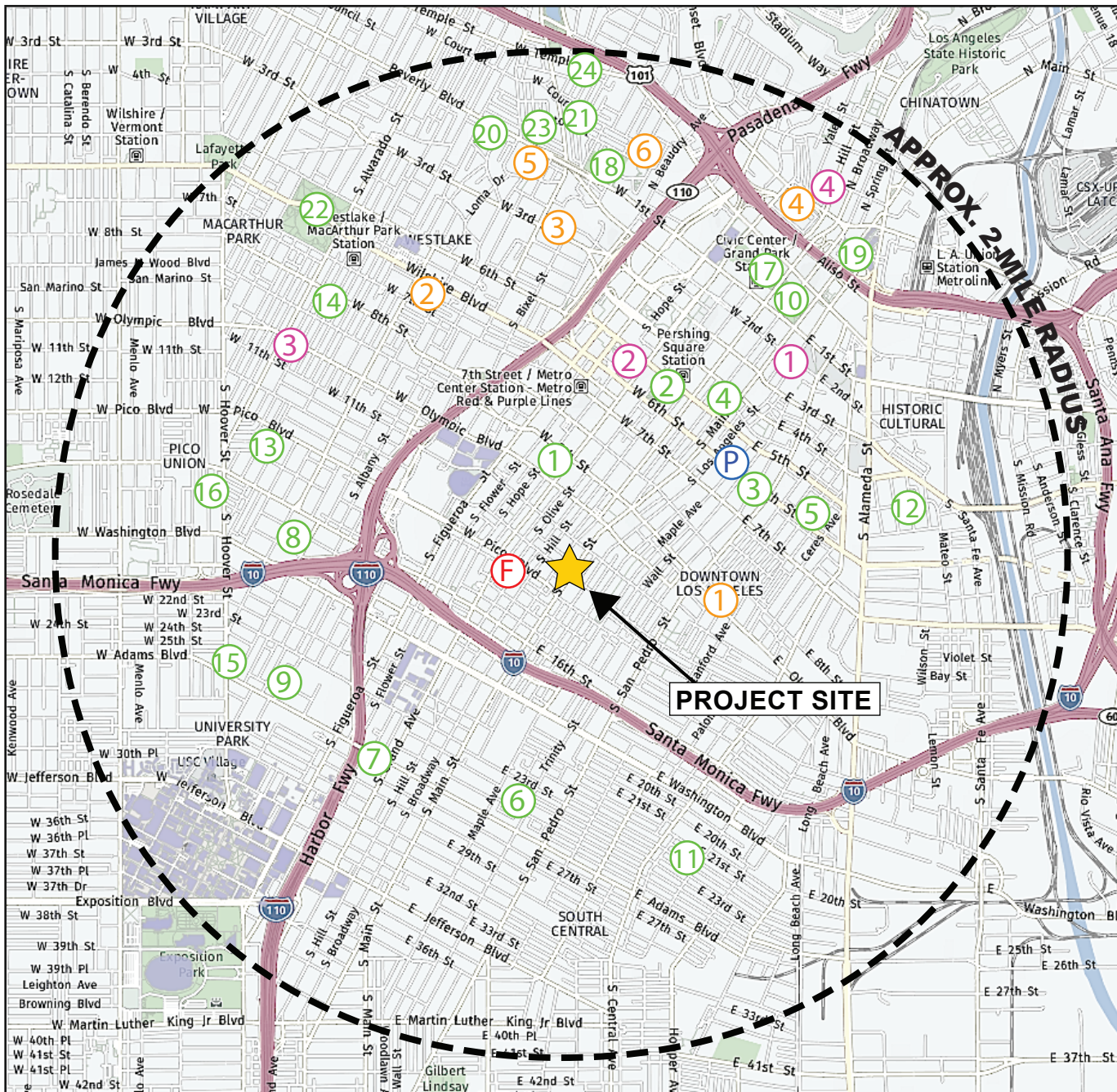
services, including fire protection and emergency medical services, and it is reasonable to conclude that the City will comply with that provision to ensure that public safety services are provided.

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 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 Proposed 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 Proposed Project. The BMPs that would be implemented during construction of the Proposed 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. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flagmen would be used to facilitate the traffic flow until construction is complete. **Construction activities of the Proposed Project would result in a less than significant impact to fire services.**



**LEGEND**

- F LAFD Station No. 10
- P Central Community Police Station
- # Schools
  1. 9th Street Elementary
  2. John H. Liechty Middle School
  3. Miguel Contreras Learning Complex
  4. Ramon C. Cortines School
  5. Belmont Senior High
  6. Edward R. Roybal Learning Center
- # Parks
  1. Grand Hope Park
  2. Pershing Square Park
  3. San Julian Park
  4. Spring Street
  5. 6th & Gladys Street Park
  6. Trinity Recreation Center
  7. Orthopaedic Hospital Playground
  8. Toberman Recreation Center
  9. Saint James Park
  10. City Hall Park Center
  11. Central Park Recreation Center/Pool
  12. Arts District Park
  13. Alvarado Terrace Park
  14. Hope and Peace Park
  15. Hoover Recreation Center
  16. Pico Union Park
  17. Grand Park
  18. Vista Hermosa Park
  19. Los Angeles Plaza Park
  20. Unidad Park
  21. Echo Deep Pool
  22. Mac Arthur Park
  23. Rockwood Community Park
  24. Patton Street Park
- # Library
  1. Central Library
  2. Little Tokyo Branch Library
  3. Pico Union Library
  4. Chinatown Branch Library

Source: Yahoo Maps, 2019.



Figure 6.3  
Public Services in the Project Site Vicinity

### ***Operation***

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company or a truck company is one mile or 1.5 miles, respectively. If the distance is exceeded, all structures located in the applicable commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Proposed Project would include up to 363 dwelling units and 12,500 square feet of ground floor commercial/retail and would generate approximately 875 new residents and 25 employees.<sup>90</sup> The Proposed Project would increase the utilization of the Project Site, which is currently occupied by four one-story commercial/retail buildings and would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 10, located at 1335 S. Olive Street, approximately 0.7 miles southwest (driving distance) of the Project Site. Fire Station No. 10 provides a paramedic rescue ambulance, basic life support rescue ambulance, and assessment light force. The next closest fire station that services the Project Site is Fire Station No. 9, located at 430 E. 7<sup>th</sup> Street, approximately 0.9 miles east (driving distance) of the Project Site. Fire Station No. 9 provides two assessment engines, basic life support truck, two paramedic rescue ambulances, and fast response unit. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 9 to the Project Site (which provides an engine company and truck company), fire protection response would be considered adequate. The Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. 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. There are three hydrants located on Main Street between 11<sup>th</sup> Street and 12<sup>th</sup> Street; one located at the southwest corner of 11<sup>th</sup> Street and Main Street, one located mid-block on the west side of Main Street fronting the Project Site, and one located on the southeast corner of Main Street and 12<sup>th</sup> Street. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

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<sup>90</sup> See Section XIV, *Population and Housing*.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e. 12<sup>th</sup> Street and Main Street). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. Based on correspondence with the LAFD (Appendix H to this SCEA), minimum fire flow requirement for the Proposed Project is 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) would be prepared and approved for the Proposed Project by the Department of Water and Power (LADWP) to ensure that fire flow requirements are considered adequate for the Project Site. With approval from LADWP, development of the Proposed Project would result in a less than significant impact to fire flow requirements. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. 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. ***Operation of the Proposed Project would not result in the increased demand for additional LAFD facilities, therefore, the Proposed Project would result in a less than significant impact to fire protection services.***

### Regulatory Compliance Measures

- RCM-PS-1 Public Services (LAFD).** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:
- Fire lanes, where required, shall be a minimum of 20 feet in width;
  - All structures must be within 300 feet of an approved fire hydrant; and

- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- Prior to plan check review, the Project Applicant shall consult with the Los Angeles Fire Department regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project. All required fire protection features shall be installed to the satisfaction of the Los Angeles Fire Department.

**b) Police protection?**

**Less Than Significant Impact.** A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. 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 police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.<sup>91</sup> Moreover, 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 police protection services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

The Project Site is currently served by LAPD Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station, located at 251 East 6<sup>th</sup> Street, approximately 0.9 mile northeast (driving distance) and five minutes without traffic from the Project Site. The Central Community Police Station area is approximately 4.5 square miles, consists of 52 Reporting Districts, and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The service boundaries for Central Area are as follows: Stadium Way, Pasadena Freeway (SR-110) to the north, Washington Boulevard, 7<sup>th</sup> Street to the south, Los Angeles River to the east, and the Harbor Freeway (I-110) to the west.

The Central Community Police Station has approximately 370 sworn personnel and 30 civilian support staff assigned. It is a culturally diverse community with a population of approximately 40,000 people. The offer to resident ratio is: 1 officer to 108 residents in the Central Area.

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<sup>91</sup> *City of Hayward et al. v. Board of Trustees of th88e California State University* (2015).

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Additionally, there are special service teams available within the LAPD to service Central Area. Central Police Station’s emergency response system is directly linked to the LAPD’s Communications Division’s Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). The average response time to emergency calls for service in Central Area during 2018 was 2.8 minutes. The average response time for non-emergency calls for service in Central Area during 2018 was 19.6 minutes.<sup>92</sup> Table 6.28, Central City Police Station Crime Statistics, provides crime statistics for Central City area in the City of Los Angeles.

**Table 6.28  
Central Area Crime Statistics**

<b>Crimes</b>	<b>2018</b>	<b>2017</b>	<b>2016</b>
Homicide	14	21	11
Rape	97	106	90
Robbery	694	720	682
Aggravated Assault	1,072	1,189	909
Burglary	349	375	324
Motor Vehicle Theft	418	395	399
Burglary From Motor Vehicle	1,743	1,368	1,101
Personal / Other Theft	2,995	2,741	2,634

Notes:  
Source: LAPD Correspondence Letter, Main Street Tower Project, June 12, 2019 (See Appendix H to this SCEA).

**Construction**

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant will be required to ensure the Project Site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed 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 keep unpermitted persons from entering the construction area. **As such, with adherence to regulations and project conditions, Proposed Project impacts would be less than significant during the construction period.**

<sup>92</sup> Los Angeles Police Department Correspondence Letter, Main Street Tower Project, June 12, 2019 (See Appendix H to this SCEA).

### **Operation**

Development of the Proposed Project would result in a net increase of residents, employees, visitors, and patrons to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site over the current conditions. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. Upon completion of the Proposed Project, the Applicant would provide the Central Area Commanding Officer with a diagram of each portion of the Proposed Project. The diagram should include access routes and any additional information that might facilitate police response. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of people at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents and employees would be able to monitor suspicious activity at the building entry points. ***These preventative and proactive security measures would decrease the amount of service calls to the LAPD. With incorporation of the security design features, which will be confirmed through the Site Plan Review process, construction of the Proposed Project would not result in the increased demand for additional LAPD facilities, therefore, the Proposed Project would result in a less than significant impact upon police services.***

### **Project Design Features**

**PDF-PS-1 Public Services (Police – Demolition / Construction Sites).** Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

**PDF-PS-2 Public Services (Police – Operation).** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to: surveillance cameras, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed.

### **c) Schools?**

**Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2. The Project Site is currently served by one elementary



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school, one middle school, and four high schools. Table 6.29, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

**Table 6.29  
Resident Schools Serving the Project Site**

School Name	Grades	Address
9 <sup>th</sup> Street Elementary School	K-5	835 Stanford Avenue
John H. Leichthy Middle School	6-8	650 S. Union Avenue
Miguel Contreras Learning Complex (includes: Academic Leadership Community, School of Business and Tourism, School of Social Justice, and School of Global Studies)	9-12	322 S. Lucas Avenue
Ramon C. Cortines School of Visual and Performing Arts	9-12	450 N. Grand Avenue
Belmont Senior High School	9-12	1575 W. 2 <sup>nd</sup> Street
Edward R. Roybal Learning Center	9-12	1200 W. Colton Street
<i>Source: Los Angeles Unified School District, Resident School Identifier, website: <a href="http://rsi.lausd.net/ResidentSchoolIdentifier/">http://rsi.lausd.net/ResidentSchoolIdentifier/</a>, accessed July 2021.</i>		

As shown in Table 6.30, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 87 elementary students, 24 middle school students, 50 high school students, and 9 special day class (SDC) students for a total of approximately 170 students. Based on correspondence with LAUSD, dated May 29, 2019 (see Appendix H to this SCEA), all of the schools serving the Project Site do not experience overcrowding except the John H. Leichthy Middle School. Pursuant to Government Code Section 65995, the mandatory payment of developer fees to the LAUSD is deemed to provide full and complete mitigation of school facilities impacts. Payment of applicable development school fees to the LAUSD would offset additional student enrollment at schools serving the Project Site.

**Table 6.30  
Proposed Project Estimated Student Generation**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	SDC Students	Total Students
<b>Proposed Project</b>						
Multi-Family <sup>a</sup>	363 du	83	23	48	8	162
Commercial/Retail <sup>b</sup>	12,500 sf	4	1	2	1	8
<b>Total Project Student Generation:</b>		<b>87</b>	<b>24</b>	<b>50</b>	<b>9</b>	<b>170</b>
<i>Notes: SDC = special day class, sf = square feet; du = dwelling units; emp = employees</i>						
<sup>a</sup> Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students, and 0.0194 SDC students per unit.						
<sup>b</sup> Per Table 15 of the 2020 LAUSD Developer Fee Justification Study, the number of students generated by the Proposed Project's commercial/retail uses is based on the neighborhood shopping center's generation factor of 2.71 employees per square feet and 0.2354 students per employee. Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students for the elementary, middle, high school, and SDCs was estimated based on the same ratio as the residential generation (51% elementary school, 15% middle school, 30% high school, and 5% SDC).						
<i>Source: Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020.</i>						

As such, the Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. ***With the payment of School Development Fee, the Proposed Project's potential impact upon public school services would be less than significant.***

### **Regulatory Compliance Measures**

**RCM-PS-2 Public Services (Schools).** The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

#### **d) Parks?**

**Less Than Significant Impact.** A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These 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 "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Project Site is located within a highly urbanized area of the Central City community and, as shown in Table 6.31, Recreation and Park Facilities within the Project Area, has access to approximately 69 acres of parkland and public recreation facilities within a two-mile radius. As summarized in Table 6.31 below, these facilities range in size from a 0.2-acre pocket park to the 29.86-acre MacArthur Park. The Proposed Project would provide approximately 39,601 square feet (1.04 acres) of total common open space and amenities on-site available exclusively to

serve Project residents and guests, which meets the minimum usable open space requirement in LAMC. The Proposed Project includes a variety of on-site amenities including, but not limited to, a fifth level amenity deck and roof deck, thereby exceeding the required square feet of open space required by the LAMC. In addition, the Project Applicant would be required to pay all applicable fees pursuant to the Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) or Quimby Fees, which would be used to provide additional park facilities in the Project area. **With payment of the mandatory developer fees, the Proposed Project's increased demands upon public parkland and recreation facilities would be reduced to less than significant levels.**

### **Regulatory Compliance Measure**

**RCM-PS-3 Recreation (Increased Demand for Parks or Recreational Facilities).** Pursuant to Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, the Project Applicant shall pay the applicable Quimby fees for construction of dwelling units.

#### **e) Other public facilities?**

**Less Than Significant Impact.** A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the project results in a significant impact on libraries is made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Central Library (538,000 square feet) located at 630 W. 5<sup>th</sup> Street, approximately 0.75 miles north of the Project Site;
- Little Tokyo Branch Library (12,500 square feet), located at 203 S. Los Angeles, Street, approximately 1.1 miles north of the Project Site;

**Table 6.31  
Recreation and Park Facilities within the Project Area**

<b>Park Name</b>	<b>Size (acres)</b>	<b>Park Amenities</b>	<b>Approx. Distance from Project Site (miles)</b>
1. Grand Hope Park	2.50	Clock tower, open space (lawns), and children's play area	0.50
2. Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	0.80
3. San Julian Park	0.30	Open space, benches, picnic tables	0.86
4. Spring Street Park	0.56	Open space, benches, and children's play area	0.87
5. 6 <sup>th</sup> & Gladys Street Park	0.34	Open space and basketball court	0.94
6. Trinity Recreation Center	2.06	Auditorium, basketball courts (lighted/outdoor), open space, children's play area.	1.05
7. Orthopedic Hospital Universal Access Playground	0.17	Children's playground	1.11
8. Toberman Recreation Center	2.20	Auditorium, barbecue pits, baseball diamond (lighted), children's play area, community room, indoor gym, picnic tables	1.14
9. Saint James Park	0.98	Children's play area, open space	1.31
10. City Hall Park Center	1.20	Open space and benches	1.31
11. Central Park Recreational Center and Pool	0.70	Basketball courts (lighted/indoor), children's play area, pool	1.33
12. Arts District Park	0.54	Children's play area, picnic area	1.36
13. Alvarado Terrace Park	0.91	Children's play area and gazebo	1.37
14. Hope and Peace Park	0.57	Basketball courts and benches	1.41
15. Hoover Recreation Center	2.46	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	1.43
16. Pico Union Park	0.75	Children's play area, picnic tables	1.47
17. Grand Park	12.00	Children's play area, fountain, open space	1.50
18. Vista Hermosa Park	2.13	Children's play area, picnic tables, soccer field	1.60
19. Los Angeles Plaza Park (El Pueblo de Los Angeles Monument)	2.60	Open space, benches, museums, and Olvera Street	1.69
20. Unidad Park (Beverly Park)	0.33	Children's play area, benches	1.76
21. Echo Deep Pool	1.04	Year-round indoor pool which offers various programming	1.78
22. Mac Arthur Park	29.86	Lake, recreation center, open space, benches, children's play area, auditorium, picnic tables, walking paths, auditorium, class room, and paddle boats	1.83
23. Rockwood Community Park	0.38	Children's play area, benches	1.78
24. Patton Street Park	0.20	Children's play area, outdoor fitness equipment, walking path, benches	1.88
<b>Total Parkland (Approximate):</b>	<b>69.22</b>		

*Sources: Park distances, size, and amenities were determined using:  
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, <http://www.laparks.org/>; and  
(2) Navigate LA, <http://navigatea.lacity.org/navigatea/>, accessed February 2019.  
Parker Environmental Consultants, 2019.*

- Echo Park Branch Library (17,543 square feet), located at 1410 W. Temple Street, approximately 1.9 miles north of the Project Site;
- Pico Union Branch (12,500 square feet), located at 1030 S. Alvarado Street, approximately 1.4 miles northwest of the Project Site; and
- Chinatown Branch Library (14,500 square feet), located at 639 N. Hill Street, approximately 1.7 miles northeast of the Project Site.<sup>93</sup>

LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 square foot facilities for communities with less than a population of 45,000 and 14,500 square foot facilities for communities with a population of more than 45,000. At 500,000 square feet the Central Library far exceeds these criteria and currently meets the library demands of the surrounding community.

### ***Construction***

Construction workers of the Proposed Project would not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. **Therefore, potential impacts to library service and facilities would be less than significant during construction of the Proposed Project.**

### ***Operation***

The Proposed Project would generate approximately 875 residents. The additional 875 residents represent a negligible amount of the current service population of the Pico Union Branch Library, Little Tokyo Branch Library, Echo Park Branch Library, and Chinatown Branch Library, and would be accommodated in the future service population of the Central Library, which serves the entire City. The LAPL has indicated that there are no current plans to build new libraries that would serve the Project area.<sup>94</sup> **Therefore, potential impacts to library service and facilities by residents would be less than significant.**

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the residential related projects is projected to generate additional employment, housing, and resident population within the Project Site area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the

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<sup>93</sup> *City of Los Angeles Public Library, Aerial Granger, Management Assistant, Facilities & Event Management, Main Street Tower Project Request for Information, June 21, 2019 (see Appendix H).*

<sup>94</sup> *City of Los Angeles Public Library, Aerial Granger, Management Assistant, Facilities & Event Management, Main Street Tower Project Request for Information, June 21, 2019. (see Appendix H)*

Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

### **Fire**

With respect to fire services, the Proposed Project, in combination with the related projects, 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 level of service. 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 generally be exempt from CEQA as a Class 32 infill project and is not likely to 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. **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.**

### **Police**

With respect to police services, the Proposed Project, in combination with the related projects, would 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 Proposed 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 of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development 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 Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.**

### **Schools**

With respect to cumulative impacts upon schools, the Proposed Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. However, each of the new housing developments 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.**

### **Parks**

With respect to cumulative impacts upon parks, development of the Proposed Project in conjunction with related projects could result in an increase in permanent residents residing in the greater Project 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 Parks and Recreation Fees, to the extent applicable. 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 recreation fees on a project-by-project basis, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.**

### **Libraries**

Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in 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 offers more than 6.5 million items, including books, magazines, photos, movies, e-books, podcasts, audiobooks, and streaming video; 1,000 online courses; and more than 18,000 public programs.<sup>95</sup> 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.<sup>96</sup> Moreover, the Central Library far exceeds the LAPL criteria for its service area. **Thus, the additional population generated by the Proposed Project and the related projects would not make a cumulatively considerable impact upon the City's library system.**

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<sup>95</sup> Los Angeles Public Library Strategic Plan 2015–2020, June 2015.

<sup>96</sup> Los Angeles Public Library Strategic Plan 2015-2020, June 2015.

# 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

**Less Than Significant Impact.** For the purpose of this SCEA, a significant impact may occur if the 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 shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, 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 (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Proposed Project would generate approximately 875 residents<sup>97</sup> and would provide a minimum of 39,601 square feet of open space areas, including common open space areas within a 5<sup>th</sup> level amenity deck and roof deck. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services. Notwithstanding the availability of on-site recreational amenities and open space areas, it is

<sup>97</sup> U.S. Census Bureau, American Community Survey (ACS) PUMS database. The City of Los Angeles citywide average population for multifamily housing is estimated to be 2.41 persons per household. (Jack Tsao, Data Analyst II, Department of City Planning Demographic Unit, June 12, 2020).



reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in Table 6.31, above, there are 24 existing, new, and recently improved parks within the Project Area totaling approximately 69 acres that are available to serve the future residents, guests, and retail visitors to the Project Site. Notable new additions to the downtown area are Patton Street, Park, Spring Street Park, and Arts District Park. In addition, the Proposed Project would provide approximately 39,601 square feet (1.12 acres) of open space and recreational facilities on-site that would be available exclusively to serve Project residents and their guests including, but not limited to, a fifth level amenity deck and roof deck. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Proposed 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 all applicable fees pursuant to the Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) or Quimby Fees, which would be used to provide additional park facilities in the Project area. Therefore, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. **Accordingly, the Proposed Project's impact upon parks and recreational facilities would be less than significant.**

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 24 existing, new, or recently improved parks within the Project Area totaling approximately 69 acres that are available to serve the future residents, guests, and retail visitors to the Project Site. The Proposed Project would also provide approximately 39,601 square feet of open space and recreational facilities 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 "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Proposed Project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park, which might have an adverse physical effect on the environment. **Thus, impacts to park and recreational facilities would be less than significant.**

### **Cumulative Impacts**

**Less Than Significant Impact.** The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City. A number of new parks and recently renovated park improvements have been made in the

## XVI. Recreation

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downtown area to accommodate cumulative demands created by increased residential development. Similar to the Proposed 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 for providing on-site open space, which is proportionately based on the amount of new development. ***Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.***

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following section summarizes and incorporates by reference the information provided in the Main Street Tower, Supplemental Vehicle Miles Traveled Analysis, prepared by Crain & Associates, dated November 21, 2019. The Supplemental VMT Analysis and the City of Los Angeles Department of Transportation (LADOT) correspondence of approval for the Supplemental VMT Analysis, dated December 19, 2019 are provided in Appendix J.1 to this SCEA.

On July 22, 2019, LADOT issued a traffic assessment report to the Department of City Planning on the proposed Main Street Tower Mixed-Use Project (ENV-2018-7379-EAF/VTT-82463/ZA-2018-7378-ZV-TDR-SPR), DOT Case No. CEN18-47813, approving the previously prepared Traffic Impact Analysis dated June 4, 2019. On July 30, 2019, pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines, the City of adopted VMT as the criteria by which to determine transportation impacts under CEQA. Therefore, in response to this action the Applicant submitted a Supplemental VMT analysis for the Proposed Project in addition to the previous analysis submitted in July 2019. The Supplemental VMT analysis addresses the current CEQA threshold questions pursuant to CEQA Guidelines Section 15064.3 subdivision (b) and SB 375. Accordingly, the previously approved July 2019 Traffic Impact Study has been included as Appendix J.2 as a non-CEQA transportation analysis for informational purposes under the City’s Site Plan Review authority as established in Section 16.05 of the LAMC. The recommended project requirements identified in LADOT’s December 19, 2019 assessment letter have been incorporated into the Project as Regulatory Compliances Measures RCM-TRAFFIC-1 and RCM-TRAFFIC-2 and as Project Design Features PDF-TRAFFIC-1 through PDF TRAFFIC-3, below.

## Regulatory Compliance Measures

- RCM-TRAFFIC-1: Parking Requirements.** In accordance with the LAMC, the project shall provide a total of 373 residential and commercial vehicle parking spaces 23 short-term bicycle parking spaces and 172 long-term bicycle parking spaces on-site.
- RCM-TRAFFIC-2: Highway Dedication and Street Widening Requirements.** Per the Mobility Element of the General Plan, Main Street, Modified Avenue I, would require a 34-foot half-width roadway within a 50-foot half-width right-of-way; 12<sup>th</sup> Street, a Modified Collector Street, would require a 20-foot half-width roadway within a 32-foot half-width right-of-way; and the adjacent alley would require a 10-foot half-width right-of-way. The applicant shall provide the required street dedication and improvements in accordance with Case No. VTT-82463.
- RCM-TRAFFIC-3 Development Review Fees.** Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

## Project Design Features

- PDF-TRAFFIC-1 Project Access and Circulation.** In order to minimize and prevent last minute building design changes, the applicant shall contact DOT for driveway width and internal circulation requirements prior to the commencement of building or parking layout design.
- PDF-TRAFFIC-2 Worksite Traffic Control Requirements.** The Applicant shall prepare and submit a construction work site traffic control plan to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/what-wedo/plan-review> to determine which section to coordinate review of the work site traffic control plan. The plan shall identify the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction related truck traffic be restricted to off-peak hours to the extent feasible.
- PDF-TRAFFIC-3 Pedestrian Safety.** The Proposed Project shall include the following features to improve pedestrian facilities and to provide a safe and walkable pedestrian environment, to increase the number of walking trips, and provide for on-site facilities to reduce the need to make vehicle trips off-site.
- Improve sidewalks adjacent to and within the Project.

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- Add pedestrian amenities such as: landscaping and setbacks, shade, benches, pedestrian-scale lighting, etc., along Main Street and 12<sup>th</sup> Street.
- Provide pedestrian-scale retail commercial uses along street frontages.
- Provide an on-site transit information kiosk.
- Provide on-site concierge service to facilitate use of transit, taxis, shuttles, and transportation network companies.

**a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Less Than Significant Impact.** A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. In accordance with the City’s TAG, a project that generally conforms with, and does not obstruct the City’s development policies and standards will generally be considered to be consistent. Table 6.32, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the project conflicts with the City’s circulation system policies. As indicated in Table 6.32, with incorporation of the PFDs referenced above, the proposed Project is in conformance with the applicable policies and programs corresponding to the proposed Project and would not preclude the City’s implementation of any adopted policy and/or program. ***Therefore, the proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.***

**Table 6.32  
Questions to Determine Project Applicability to Plans, Policies and Programs**

#	Guiding Questions	Response
<b><i>Existing Plan Applicability</i></b>		
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? (screening question)	<p><b>No Conflict.</b> The Proposed Project would conform to the standard street, sidewalk, and alleyway dimensions pursuant to the Mobility Plan 2035 standards. Main Street, a Modified Avenue I street, requires a 34-foot half-width roadway within a 50-foot half-width right-of-way. Main Street is currently improved to these standards with a 15-foot wide sidewalk along the Project’s frontage. The Proposed Project would maintain a 16-foot sidewalk and no further dedications or widenings would be required.</p> <p>12<sup>th</sup> Street is a designated Modified Collector Street and requires a 20-foot half-width roadway within a 32-foot half-width right-of-way. 12<sup>th</sup> Street currently has a 20-foot half-width and a 10-foot wide sidewalk fronting the Project Site. The Proposed Project would provide a 2-foot dedication to accommodate a 12-foot sidewalk, which is consistent with the standards pursuant to the Mobility Plan 2035.</p>

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		<p>The Mobility Plan 2035 states that alleys shall have a standard width of 20 feet with a 10-foot half width. The adjacent alley is currently 12 feet wide with a 6-foot half width. The Proposed Project would provide a standard 10-foot half-width on the east side of the alley fronting the Project Site. As such, the Proposed Project would be consistent with the alley standards as specified in the Mobility Plan 2035.</p> <p>Thus, as the Proposed Project would accommodate the required street, sidewalk, and alleyway standards, there would be no conflict with the Mobility Plan 2035 street designations.</p>
2	Is the Project Site along any network identified in the City's Mobility Plan?	<p><b>No Conflict.</b> Main Street, between Venice Boulevard and 9<sup>th</sup> Street is identified as a Moderate Plus Transit Enhanced street on the Transit Enhanced Network Map, a designated Tier 1 Protected Bicycle Lane on the Bicycle Lane Network Map, and a pedestrian segment within the Pedestrian Enhanced Districts Map in the Mobility Plan 2035. At the time of preparing this report, a Tier 1 bike lane on Main Street fronting the Proposed Project has not been programmed for completion before the Project design year of 2026 so there are no definitive details on roadway layouts to accommodate the improvements, and so they are not included in the project analysis. The Main and Spring Forward Project, which was recently approved by the City Council in October 2019, proposes transit improvements within the right-of-way to improve pedestrian walkability and protected bike lanes along Main Street between Cesar Chavez Avenue to 9<sup>th</sup> Street. However, these improvements do not extend to the Project Site. The Proposed Project would not conflict with the current southbound bike lane on the west side of Main Street. As such, no conflict would occur.</p> <p>The Proposed Project is not located in the High Injury Network (HIN). As such the Proposed Project would not conflict with any of the network programs or policies of the Mobility Plan 2035.</p>
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	<p><b>No Conflict.</b> As noted above, the Proposed Project would provide a two-foot dedication on 12<sup>th</sup> Street to accommodate a 12-foot wide sidewalk. The Proposed Project would also provide a 10-foot setback from the centerline of the alley to accommodate the City's standard alley dimensions. No roadway improvements or dedications are required along Main Street. As such, the Proposed Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.</p>
4	Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	<p><b>No Conflict.</b> The Proposed Project does not require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program. As such, no conflict would occur.</p>

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5	Is the Project Site in an Identified Transit Oriented Community?	<b>No Conflict.</b> The Project is located in a Tier 3 Transit Oriented Community. As discussed in Section II, Project Description, the Project Site is designated as a “Transit Priority Area” per the Department of City Planning’s Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. The Proposed Project is consistent with the Connect SoCal policies to develop high density housing in proximity to high quality transit areas and employment centers. As such, the Proposed Project would not conflict with policies associated with TOC areas.
6	Is the Project Site on a roadway identified in the City’s High Injury Network?	<b>No Conflict.</b> The Project Site is not identified in the City’s High Injury Network. As such, no conflict would occur.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	<b>No Conflict.</b> Thus, the Proposed Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
8	Does the Project propose narrowing or shifting existing sidewalk placement?	<b>No Conflict.</b> The Proposed Project would provide a 16-foot wide sidewalk along Main Street and a 12-foot wide sidewalk along 12 <sup>th</sup> Street. As such, no conflict would occur. See also responses to questions 2 and 7 above.
9	Does the Project propose paving, narrowing, shifting or removing an existing parkway?	<b>No Conflict.</b> The Project does not propose any modifications to an existing parkway.
10	Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	<b>No Conflict.</b> The Project will not modify, remove, or otherwise affect existing bicycle infrastructure. As discussed above, Main Street is a designated Tier 1 Protected Bicycle Lane on the Bicycle Lane Network Map. Currently the west side of Main Street is striped to provide a southbound bike lane. The Proposed Project would not conflict with the existing bike lane. Primary access to the Proposed Project and its loading dock will be provided via the alley. A secondary driveway would be located on Main Street in the same general location as the existing driveway curb cut. As the Proposed Project would not increase the number of curb cuts or turning movements on Main Street, there would be no conflict with existing bicycle infrastructure.
11	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	<b>No Conflict.</b> The Project Site is adjacent to an alleyway which borders the Project Site to the west. This alley is currently a substandard width of 12 feet, whereas the standard alley width standard is 20 feet with a 10-foot half width. The Proposed Project would provide for a 10-foot half width on the east side of the alley fronting the project to conform to the City’s standard alley width dimensions. As such, no conflict would occur.

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12	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	<b>No Conflict.</b> The Project Site is not located adjacent to a cul-de-sac. As such there would be no conflict with the Mobility Plan 2035.
<b>Access: Driveways and Loading</b>		
13	Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	<b>No Conflict.</b> As noted above, the Proposed Project would maintain the existing driveway curb cut on Main Street to provide access to a secondary access driveway. The Proposed Project's main access and loading dock will be accessed via the alley. These improvements would be implemented in coordination with LADOT and thus would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
14	If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	NA.
15	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	<b>No Conflict.</b> The Project Site includes a corner lot at the intersection of 12 <sup>th</sup> Street and Main Street. The Proposed Project would maintain the existing driveway on Main Street, which is approximately 370 feet north of 12 <sup>th</sup> Street and more than 175 feet south of 11 <sup>th</sup> Street. As such, the Proposed Project would not be too close to an intersection. Furthermore, site access and driveway design would be designed and developed in consultation with the LADOT, LADBS, and the LAFD, and would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
16	Does the Project propose driveway width in excess of City standard?	<b>No Conflict.</b> Per LADOT's Manual of Policies and Procedures, Section 321, it is recommended that two-way driveways serving multi-family residential projects with more than 25 parking spaces are 30 feet in width. The Project's driveway width is 30 feet wide and would thus be in conformance with City standards.
17	Does the Project propose more driveways than required by City maximum standard?	<b>No Conflict.</b> The Project proposes one two-way driveway along Main Street as a secondary point of access. The Proposed Project's main access driveway to the parking structure would be provided via the alley, which is compliant with LADOT's Manual of Policies and Procedures, Section 321.
18	Are loading zones proposed as part of the Project?	<b>No Conflict.</b> The Proposed Project incorporates one loading zones on the west side of the Project Site adjacent to the alley. As such, the project would be consistent with City policies that recommend loading be located away from arterial streets.
19	Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	<b>No Conflict.</b> The Proposed Project's passenger loading and drop-off area is located internal to the parking garage and will be accessible via the alley. As such, the Proposed Project would not conflict with Mobility Plan 2035 policies regarding drop off areas.



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20	Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)?	<b>No Conflict.</b> The Project does not propose to modify, limit or remove public access to the public right-of-way. Thus, no conflict would occur.
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**b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?**

**Less Than Significant Impact.** CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On July 30, 2019, the City of Los Angeles adopted LADOT’s CEQA Transportation Assessment Guidelines (TAG), which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts in conformance with SB 743. The adopted TAG establishes VMT as the City’s formal method of evaluating a project’s transportation impacts. As part of the preparation of this version of the City’s TAG, the City updated its travel demand simulation model and transportation impact thresholds to be consistent with the VMT impact methodology.

***VMT Screening***

To determine whether the Project requires further VMT analysis, the Project’s existing and proposed land uses were inputted into the VMT Calculator. As shown in Appendix J.1, Supplemental VMT Analysis, the Housing (Multi-Family) and Retail (General Retail) land use rates were applied to the corresponding proposed Project uses. For screening purposes, the Retail (General Retail) land use rates were applied to the existing land use, as no specialty retail land use code is available within the VMT Calculator. Based on the VMT Calculator, the Project would generate 717 net daily trips and 3,027 net daily VMT (proposed minus existing). As the Project would generate more than 250 net daily trips and would result in a net increase in daily VMT, the Project would meet both screening criteria and further VMT analysis is required.

***VMT Thresholds***

LADOT has identified thresholds for significant VMT impacts by sub-area of the City, by Area Planning Commission (APC) area. The State of California Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15% or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA. CEQA allows lead agencies to set or apply their own

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significance thresholds. LADOT set its significance thresholds as follows: a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15% below the existing average household VMT per capita for the APC area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15% below the existing average work VMT per employee for the APC area in which it's located. (LADOT Guidelines, page 17.)

The Project is located in the Central APC. For this area of the City the following specific thresholds have been identified:

- Household VMT Per Capita: 6.0
- VMT Per Employee: 7.6

**VMT Analysis**

In accordance with the City’s TAG methodology, the VMT Calculator was utilized to determine household VMT per capita and the work VMT per employee. To be conservative, although the Project proposes to incorporate TDM strategies (such as reducing the Project parking supply from the standard amount required per City Municipal Code and providing short- and long-term bicycle parking supplies), implementation of these strategies was not considered for the Project’s VMT calculation. The VMT Calculator determined that the residential portion of the Project would generate a household VMT per capita of 5.1. Since the Project is located within the Central Area Planning Commission area, the appropriate threshold of significance with which to compare the Project’s household VMT estimate is 6.0 daily household VMT per capita, as shown in Table 6.33. Therefore, the Project is expected to have a less-than-significant VMT impact based on the residential component. Since the Project’s retail component would not exceed 50,000 square feet, the retail component was determined not to have a significant VMT impact and the work VMT per employee was not calculated for the Project. Thus, the residential and retail components of the proposed Project would result in less-than-significant VMT impacts under the updated TAG.

**Table 6.33  
VMT Analysis**

Category	Household			Work <sup>[a]</sup>		
	Household VMT Threshold	Household VMT Per Capita	Significant Impact?	Work VMT Threshold	Work VMT per Employee	Significant Impact?
Proposed Project	6.0	5.1	No	7.6	0	No

*Source: Crain and Associates, Main Street Tower, 1123-1161 S. Main Street Supplemental Vehicle Miles Traveled Analysis, December 21, 2019 (see Appendix J.1 to this SCEA)*

- 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.** A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features.

Current vehicular access is provided by a driveway located along Main Street that provides access to the surface parking lot on the Project Site. The Proposed Project would provide two full-access driveways, including one along Main Street and one along the adjacent alleyway. Additional entrance-only and exit-only driveways would be located along the alleyway to provide access to the handicapped parking spaces. The width of the driveways would conform to LADOT minimum standards for a commercial driveway and include a single inbound and single outbound travel lane. The circulation aisle widths of the parking areas are designed to allow adequate and safe circulation of vehicles without significant conflicts and conform to LADOT parking aisle width standards. Each of the full-access driveways would provide direct access to the parking garage. The Proposed Project would include new driveways with vehicular access to the Project Site, which, if not properly designed and constructed, could potentially conflict with pedestrian circulation in the Project area. Environmental impacts may result from Project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. ***However, Regulatory Compliance Measure RCM-TRAFFIC-2 and Project Design Feature PDF-TRAFFIC-1, above, would ensure potential impacts associated with dedication requirements and project access and circulation are reduced to a less than significant level. The Worksite Traffic Control Requirements (PDF-TRAFFIC-2) would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The implementation of these Project Design Features would ensure any traffic impacts from construction are less than significant.***

**d) Result in inadequate emergency access?**

**Less Than Significant Impact.** A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section IX(f), the Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.<sup>98</sup> Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.<sup>99</sup> Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience,

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<sup>98</sup> Los Angeles County Department of Public Works, *City of Los Angeles Central Area Disaster Route Map*, August 13, 2008.

<sup>99</sup> *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles*, April 1995.

## XVII. Transportation

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they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. **Therefore, the Proposed Project would not be expected to result in inadequate emergency access and impacts would be less than significant.**

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City Community Plan Area. As noted in Question XVII(b), above, the Proposed Project's increase in VMT would be less than the threshold for a significant impact to occur, and the Proposed Project's contribution to cumulative impacts is less than significant and would not be cumulative considerable. **Therefore, the Proposed Project's cumulative impact is considered less than significant.**

# XVIII. Tribal Cultural Resources

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:

	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 Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?</b>				
<b>b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. 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?</b>				

**Responses to a and b: Less Than Significant Impact.** For purposes of this analysis, Dudek was retained to prepare a Tribal Cultural Resources Report to assess the potential for significance of the Project to impact resources associated with California Native American tribes. The following section is based on the following technical report:

- Dudek, Tribal Cultural Resources Report for The Main Street Tower Project, City of Los Angeles, Los Angeles County, California, September 2021.

The northern half of the Project Site was recently razed and converted into a parking lot, while the southern half of the Project Site is currently developed with four commercial buildings. The project site is located within a highly urbanized area, surrounded by existing and planned development. Surrounding uses in the immediate vicinity of the Project Site include commercial, office and residential uses to the east and west; residential uses to the north; commercial and office uses to the west; and commercial and residential uses to the south. One residential building to the northeast of the Project Site at the corner of South Broadway and West 11<sup>th</sup> Street, is currently under renovation.

The Project Site is situated in the valley representing Downtown Los Angeles, approximately 13 miles northeast of the Pacific Ocean and approximately 1.2 miles west of the Los Angeles River. Existing development is underlain by Quaternary alluvium and marine deposits, generally dating between the Pliocene and the Holocene. Soils are dominated by the Urban land, commercial, complex, associated with low-slope alluvial conditions (USDA 2019). Due the size and nature of past development associated with the surroundings structures and existing paved area native subsurface soils with potential to support the presence of cultural deposits have likely been disturbed.

Dudek conducted a California Historical Resources Information System (CHRIS) records search at the South Central Coastal Information Center (SCCIC) on January 31, 2019 for the proposed Project Site and surrounding 0.5 mile search buffer. This search included their collections of mapped prehistoric, historic, and built environment resources, Department of Parks and Recreation (DPR) Site Records, technical reports, and ethnographic references. The records search indicated that 38 previous cultural resource studies have been conducted within the records search area between 1978 and 2017. Of these studies, none overlap the Project Site.

A total of 47 previously recorded cultural resources have been documented within a half-mile of the Project Site. None of these intersect the Project Site. Of these, 46 are historic-era buildings or structures. The remaining resource consists of a historic-era trash deposit. No cultural resources of Native American origin are documented within the Project Site or surrounding half-mile search area of files held at the SCCIC. No resources identified within the records search area are documented in association with historic-era Zanja features, which has been represented on historical maps to have run 0.25 miles west of the Project Site. No physical evidence of the Zanja system has been documented to date in the vicinity. A brief history and explanation of the Zanja system is provided below.

### The Zanja System

As previously mentioned, Report LA-13229 has mapped segments of the Zanja Madre running approximately 0.25 miles northwest and 0.19 miles to the southeast of the Project Site area. The Zanja Madre network and subsequent additional zanja segments were Los Angeles' original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads. The water conveyance system consisted of interconnected ditches known as "zanjas" and was established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. The first segment of the system was known as the Zanja Madre, and is thought to have run from a point on the Los Angeles River north of the city, south near present-day Main Street terminating near the Plaza, present-day Union Station. Though researchers and the public often use the term "Zanja Madre" to refer to the larger water conveyance network, this term more accurately describes just the initial component established during the Spanish Period. The Zanja system largely faded into disuse by the early twentieth century as the system began to face increased criticism for its inefficiency and imprecision.

### Native American Correspondence

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on January 29, 2019. The NAHC emailed a response on January 31, 2019, which indicated that the SLF search was completed with negative results. Documents related to the NAHC SLF search are included in Appendix K to this SCEA. Based on the fact that the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, and no substantial evidence has been provided to support a conclusion that the Proposed Project would have a significant impact upon tribal cultural resources, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources no mitigation measures are required. ***Nonetheless, adherence to the regulatory compliance measures referenced above in Section V, Cultural Resources, would ensure impacts associated with the accidental discovery of any archaeological resources or human remains, including Native American resources would be less than significant.***

### Cumulative Impacts

Development of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to tribal cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following appropriate mitigation. ***Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.***

# 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## PROJECT-SPECIFIC IMPACTS

- 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**

The LADWP ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).<sup>100</sup> In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd.<sup>101</sup>

Based on information provided by the LADWP, the Project Site is currently served by a 12- inch cast iron pipe beneath the west side of S. Main Street, a 24-inch steel pipe on the south side of S. 12<sup>th</sup> Street and reduced to a 12-inch ductile iron pipe at the west side of the intersection of 12<sup>th</sup> Street and Main Street.<sup>102</sup> As noted in the services response letter, LADWP has indicated that it should be able to provide the domestic needs of the Project from the existing water system and there are no known deficiencies in the water system serving the Project Site.<sup>103</sup> A final determination on the Project's water system will be made in consultation with the Project Engineer and the LADF after the residual fire pressure requirements are established in consultation with the LAFD.

As shown in Table 6.34, the Proposed Project would generate a net increase in water demand of approximately 40,105 gallons per day (gpd) of water (or approximately 45 acre feet per year), which is significantly below available capacity.<sup>104</sup> Because the Proposed Project's employment growth is within SCAG's forecast, the Proposed Project's increased water demand would not

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<sup>100</sup> U.S. Department of Energy, website: <https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization---oxygen-plant-replacement>, accessed February 2019.

<sup>101</sup> Los Angeles Department of Water and Power, *Water, L.A.'s Drinking Water Quality Report*, website: <http://www.ladwp.com/>, accessed February 2019.

<sup>102</sup> Los Angeles Department of Water and Power, *Water and Electricity Connection Services Request Response letter, June 6, 2019 (see Appendix H)*.

<sup>103</sup> Los Angeles Department of Water and Power, *Water and Electricity Connection Services Request Response letter, June 6, 2019 (see Appendix H)*.

<sup>104</sup> *The Project Site is developed with 28,110 square feet of retail space. However, at the time the environmental analysis commenced only 26,710 square feet of the site was occupied with active retail land uses and 1,400 square feet was vacant. As such, the Proposed Project's net water demand was conservatively estimated based on the 26,710 square feet of active uses.*

measurably reduce the LAAFP’s capacity. Therefore, no new or expanded water treatment facilities would be required. **With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.**

**Table 6.34  
Proposed Project Estimated Water Demand**

Type of Use	Size	Water Demand Rate (gpd/unit) <sup>a</sup>	Total Water Demand (gpd)
<b>Existing Uses (to be removed)</b>			
Commercial/Retail	26,710 sf	0.025 gpd/sf	668
<b>Total Existing Water Demand:</b>			<b>668</b>
<b>Proposed Project</b>			
<b>Residential Units (363 total)</b>			
Studio	122 du	75 gpd/du	9,150
One Bedroom	133 du	110 gpd/du	14,630
Two Bedroom	96 du	150 gpd/du	14,400
Three Bedroom	12 du	190 gpd/du	2,280
<b>Subtotal Residential:</b>			<b>40,460</b>
<b>Commercial</b>			
Commercial/Retail	12,500 sf	0.025 gpd/sf	313
<b>Subtotal Commercial:</b>			<b>313</b>
<b>Total Project Site Water Demand:</b>			<b>40,773</b>
<i>Less Existing Water Demand:</i>			<i>(668)</i>
<b>Net Water Demand:</b>			<b>40,105 gpd</b>
<p><i>Notes: sf =square feet; du = dwelling units</i></p> <p><sup>a</sup> <i>Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012. It is assumed that all water usage would convert to wastewater.</i></p> <p><i>Source: Parker Environmental Consultants, 2019.</i></p>			

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area. Any such improvement would generally be exempt from CEQA as a Class 32 project and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. **Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.**

**Regulatory Compliance Measures**

**RCM-PU-1 Water Connection.** As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase.

- RCM-PU-2 Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.
- RCM-PU-3 Water.** The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- RCM-PU-4** The Proposed Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development in order to 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 in accordance with the California Building Energy Efficiency Standards by 20%. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs.

### ***Wastewater Treatment Facilities and Existing Infrastructure***

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.<sup>105</sup> This equals a remaining capacity of 175 mgd of wastewater able to be treated at

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<sup>105</sup> *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: [https://www.lacitysan.org/san/faces/wcnav\\_externalld/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=t4yrq0jkq\\_4&\\_afLoop=10780400868530458#!](https://www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afLoop=10780400868530458#!), accessed February 2019.*

XIX. Utilities and Service Systems

the HWRP. As shown in Table 6.35 below, the Proposed Project would generate approximately 40,105 gpd of wastewater, representing a fraction of one percent of the available capacity.

**Table 6.35  
Proposed Project Estimated Wastewater Generation**

Type of Use	Size	Wastewater Demand Rate (gpd/unit)	Total Wastewater Demand (gpd) <sup>a</sup>
<b>Existing Uses (to be removed)</b>			
Commercial/Retail	26,710 sf <sup>b</sup>	0.025 gpd/sf	668
<b>Total Existing Wastewater Generation:</b>			<b>668</b>
<b>Proposed Project</b>			
<b>Residential Units (363 total)</b>			
Studio	122 du	75 gpd/du	9,150
One Bedroom	133 du	110 gpd/du	14,630
Two Bedroom	96 du	150 gpd/du	14,400
Three Bedroom	12 du	190 gpd/du	2,280
<b>Subtotal Residential:</b>			<b>40,460</b>
<b>Commercial</b>			
Commercial/Retail	12,500 sf	0.025 gpd/sf	313
<b>Subtotal Commercial:</b>			<b>313</b>
<b>Total Project Site Wastewater Generation:</b>			<b>40,773</b>
<i>Less Existing Wastewater Generation:</i>			<i>(668)</i>
<b>Net Wastewater Generation:</b>			<b>40,105 gpd</b>
<p><i>Notes: sf =square feet; du = dwelling units</i></p> <p><sup>a</sup> <i>City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories, effective April 6, 2012.</i></p> <p><sup>b</sup> <i>The Project Site is developed with 28,110 square feet of retail space. However, at the time the environmental analysis commenced only 26,710 square feet of the site was occupied with active retail land uses and 1,400 square feet was vacant. As such, the Proposed Project's net wastewater generation was conservatively estimated based on the 26,710 square feet of active uses</i></p> <p><i>Source: Parker Environmental Consultants, 2019.</i></p>			

The Project Site area is presently served by a network of sewer lines that are located beneath most of the major streets that convey sewage from the Project Site to the HWRP. As part of the pre-construction process, detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point for the Project Site. Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (No. 166,060), BOS does not make a determination of sewer capacity until LADBS has established that the Proposed Project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from the Proposed Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, BOS will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicant has received a Sewer Capacity Availability Request (SCAR), dated May 23, 2019, that verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. The BOS has determined that the sewer

## XIX. Utilities and Service Systems

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system has sufficient capacity to serve the Proposed Project. Based on the configuration of sewer lines serving the Proposed Project, the Proposed Project's sewer flows would be connected to the existing lines under Main Street. Such connections involve trenching, excavating and backfilling the sewer lines beneath the public right-of-way and would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. **Therefore, impacts to sewer capacity and infrastructure would be less than significant.**

### **Stormwater Drainage Facilities**

As described in Question X(c), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85<sup>th</sup> percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with four commercial/retail buildings and surface parking. One commercial building on site is currently vacant. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question X(a), the Proposed Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. **Therefore, Proposed Project impacts on stormwater drainage infrastructure would be considered less than significant.**

### **Electricity**

The Project Site is currently served by three underground 4.8kV circuits adjacent to the Project Site along S. Main Street, one 4.8 kV circuit adjacent to the Project Site along 12<sup>th</sup> Street, and two underground 34.5 kV circuits adjacent to the Project Site along 12<sup>th</sup> Street.<sup>106</sup> As such, electric service is available and would be provided to the Project Site. The LADWP has confirmed that there are no known deficiencies in the electricity service serving the Project Site, but the LADWP may require space for a minimum of two pads for electrical equipment within the property with the required clearances.<sup>107</sup> The estimated power requirements for the Proposed Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the panned growth of the City's power system.

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<sup>106</sup> Los Angeles Department of Water and Power, *Water and Electricity Connection Services Request Response letter, June 6, 2019 (see Appendix H)*.

<sup>107</sup> Los Angeles Department of Water and Power, *Water and Electricity Connection Services Request Response letter, June 6, 2019 (see Appendix H)*.

The Project Site is located in a highly urbanized area in the Central City area. The surrounding area is served by overhead electrical systems. The Proposed Project would require on-site transformation and may require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Any such infrastructure improvement would generally be exempt from CEQA as a Class 32 project. **Therefore, potential impacts resulting from electricity infrastructure improvements would be less than significant.**

### **Natural Gas**

Natural gas is provided by Southern California Gas. Adequate natural gas service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of natural gas is dependent upon adequate fuel supplies and a reliable distribution system. As discussed in response to Checklist Question VI(a), above, SoCalGas' natural gas storage fields have a combined theoretical storage working inventory capacity of approximately 137.1 Bcf.<sup>108</sup> The Proposed Project's natural gas demand is estimated to be approximately 1,414,966 cubic feet per month, which represents a very small fraction of one percent of the SCG's existing natural gas storage capacity. Therefore, the proposed Project's natural gas demand would be within the SCG's existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. Natural gas is already supplied to the project Site, establishing new service connections would be localized in nature and would involve minimal trenching and backfilling of soil within the Project Site. **As such, the Proposed Project would not result in the relocation or construction of new or expanded natural gas facilities with the potential to cause significant environmental effects.**

### **Telecommunications**

Adequate telecommunications services exist within in the immediate Project vicinity and would be provided to the Project Site based on demand. Construction and operation of the Proposed Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. **As such, Proposed Project impacts to telecommunication facilities would be less than significant.**

- b) **Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less Than Significant Impact.** A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The

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<sup>108</sup> SoCalGas 2019 GRC Filing, Exhibit SCG-10-R, p. NPN-3 and NPN-4.

## XIX. Utilities and Service Systems

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determination of whether the Proposed 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.

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 (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 6.34, the Proposed Project's net increase for water demand would be 40,105 gallons per day. The Proposed Project's population, housing, and employment growths are within SCAG's forecast. Accordingly, the Proposed Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2016 California Green Building Standards Code (CAL Green) and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170,978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181,288 (Emergency Water Conservation

Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. ***Compliance with the regulatory compliance measures identified above would reduce the Proposed Project's demands for potable water resources to a less than significant level.***

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section XIV, Population and Housing, the Proposed Project's population and employment growth is consistent with SCAG's growth projections for the City of Los Angeles subregion. Similar to the Proposed Project, each related project would be evaluated to determine whether the water demand was accounted for in the UWMP or would otherwise be required to obtain approval from the LADWP certifying that the LADWP has sufficient water supplies available to serve the project. ***As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan, and impacts associated with increased water demand would not be cumulatively considerable, and cumulative 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 project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. A significant impact would also occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes an



NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. Wastewater from the Project Site is and would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB. As demonstrated above, HWRP has sufficient capacity for the Proposed Project. **Therefore, a less than significant impact would occur.**

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity.

#### *Local Wastewater Generation*

Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from BOSs, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

#### *Regional Wastewater Generation*

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project. **As such, cumulative impacts with respect to wastewater demand 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?**

**Less Than Significant Impact.** A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection

## XIX. Utilities and Service Systems

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route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.<sup>109</sup> State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.<sup>110</sup>

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

In 2017, the City of Los Angeles entered into exclusive franchise agreements with waste haulers to provide solid waste, commingled recyclables, and organics collection, transfer, disposal and processing services to commercial and multifamily establishments in the City. The companies that were awarded the contract for each franchise secured a dedicated waste stream, increasing the financial viability to develop new organic waste processing and conversion technology facilities in the vicinity of the City of Los Angeles.

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<sup>109</sup> *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

<sup>110</sup> *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

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The Project Site is located within the Downtown Commercial Waste Franchise Zone, which is serviced under contract to NASA Services, Inc. Under the existing contract, the service provider is required to deliver all solid waste resources collected to the following certified facilities:

- Central Los Angeles Recycling and Transfer Station (CLARTS), located at 2201 E. Washington Boulevard and
- Puente Hills Material Recovery Facilities, located at 2808 S. Workman Mill Road.<sup>111</sup>

All solid waste is disposed onto these two recycling and transfer facilities. Then all trash and non-recyclables materials are transferred to a landfill that accepts non-recyclable waste. It is assumed that the Proposed Project's solid waste would be disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 68.0 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 20 years.<sup>112</sup>

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided in Table 6.36, it is estimated that the proposed construction activities would generate approximately 3,780 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. Pursuant to Section 66.32 of the LAMC, the Proposed Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Bureau of Sanitation.

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<sup>111</sup> *City of Los Angeles, Personal Services Contract Between The City of Los Angeles and NASA Services, Inc., for Exclusive Franchise to Provide Collection, Transfer, Processing, and Disposal Services for Solid Resources to Commercial Establishments and Applicable Multifamily Establishments in the Downtown Zone.*

<sup>112</sup> *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2017 Annual Report, April 2019.*

**Table 6.36  
Estimated Construction and Demolition Debris**

<b>Construction Activity</b>	<b>Size</b>	<b>Rate <sup>a</sup></b>	<b>Generated Waste (tons)</b>
<b>Demolition</b>			
Commercial/Retail	28,110 sf	155 lbs/sf	2,179
Surface Asphalt	22,757 sf <sup>b</sup>	2,400 lbs/cy	506
<b>Construction</b>			
Residential	330,935 sf	4.38 lbs/sf	725
Ground-floor Commercial/Lobby	47,089 sf	3.89 lbs/sf	92
Parking Levels	143,058 sf <sup>c</sup>	3.89 lbs/sf	278
<b>Total Debris:</b>			<b>3,780</b>
<p><i>Notes: sf= square feet</i></p> <p><sup>a</sup> USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.</i></p> <p><sup>b</sup> <i>It is estimated that approximately 22,757 sf of paved asphalt encompasses the Project Site and approximately ½-inch deep.</i></p> <p><sup>c</sup> <i>Parking garage area was estimated by multiplying the Project Site by three levels since there are three levels of above grade parking.</i></p> <p>Source: Parker Environmental Consultants, 2019.</p>			

As shown in Table 6.37, below, Estimated Operational Solid Waste Generation, the Proposed Project’s net generation during operation of the Proposed Project would be 4,135 pounds per day, as compared to the existing uses on the Project Site. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project’s solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project’s regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. ***The amount of solid waste generated by the Proposed Project is within the available capacities of area landfills, and the Proposed Project’s impacts to regional landfill capacity would be less than significant.***

**Table 6.37  
Expected Operational Solid Waste Generation**

Type of Use	Size <sup>b</sup>	Solid Waste Generation Rate <sup>a</sup> (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
<b>Existing Uses (to be removed)</b>			
Commercial/Retail (26,710 sf)	54 emp	10.53 lbs/employee/day	569
<b>Total Existing Solid Waste Generation:</b>			<b>569</b>
<b>Proposed Project</b>			
Residential	363 du	12.23 lbs/du/day	4,440
Commercial/Retail (12,500 sf)	25 emp	10.53 lbs/employee/day	264
<b>Total Project Solid Waste Generation:</b>			<b>4,704</b>
			<i>Less Existing:</i>
			<i>(569)</i>
<b>NET TOTAL Solid Waste Generation:</b>			<b>4,135</b>
<i>Notes: sf = square feet</i> <sup>a</sup> <i>Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i> <sup>b</sup> <i>The employee generation factor for commercial/retail uses were taken from the City of Los Angeles Department of Transportation VMT Calculator (see Appendix J.1 CEQA VMT Analysis, November 17, 2020).</i> <i>Source: Parker Environmental Consultants, 2019.</i>			

**Regulatory Compliance Measures**

**RCM-PU-5 Solid Waste Recycling - Construction/Demolition.** In compliance with LAMC Section 66.32.1, the Project shall incorporate the following:

- Prior to the issuance of any demolition or construction permit, the Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate on-site separation and recycling of demolition- and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

**RCM-PU-6 Solid Waste Recycling – Operational.** In compliance with LAMC Section 66.32 and AB 341, the Project shall incorporate the following:

- All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

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- Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program.

**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, Assembly Bill 341 (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 multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas 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 greenhouse gas 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 Proposed Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Proposed Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which

requires that development projects include an on-site recycling area or room of specified size. The Proposed 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 Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.***

### **Cumulative Impacts**

**Less Than Significant Impact.** Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2017 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 126.4 million tons in the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons.<sup>113</sup> However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.<sup>114</sup> Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green

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<sup>113</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.*

<sup>114</sup> *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

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Mulching and Composting workshops, back yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station (CLARTS) and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. ***Therefore, the Proposed Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.***



# XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses a through d: No Impact.** A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Proposed Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. **Therefore, this checklist question is not applicable to the Proposed Project, and no impact would occur.**

# 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 Impact.** A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California’s history or pre-history. As noted in the analysis above, the Project Site is developed with four commercial/retail buildings and surface parking lot and does not support any substantial habitat of a fish or wildlife species. Vegetation on the Project Site is limited to trees in the public right-of-way. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

Additionally, although no known direct impacts to historic resources are anticipated, compliance with existing regulations would ensure any impacts upon cultural resources are less than significant level in the unlikely event any such historic, or archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the Proposed Project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance, any impacts to paleontological resources would be less than significant. ***Therefore, with adherence to regulatory compliance measures, the Proposed Project would not have the potential to 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.***

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Less Than Significant Impact.** A significant impact may occur if the Proposed Project, in conjunction with other 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, the Proposed Project’s incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. ***As such, the Proposed Project’s contribution to cumulative impacts would be less than significant.***

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less Than Significant with Mitigation Incorporated.** A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation where applicable. ***Thus, with mitigation, any potentially significant impacts to humans would be less than significant.***

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## 8. References, Acronyms, and Abbreviations

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## 2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition

CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH <sub>4</sub>	Methane
CHRIS	California Historical Resources Information Systems
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources

du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L <sub>dn</sub>	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L <sub>eq</sub>	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service

LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M <sub>max</sub>	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N <sub>2</sub> O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O <sub>3</sub>	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM <sub>10</sub>	respirable particulate matter
PM <sub>2.5</sub>	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases



ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF <sub>6</sub>	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SLIC	Spills, Leaks, Investigation and Cleanup
SO <sub>2</sub>	sulfur dioxide
SO <sub>4</sub>	sulfates
SO <sub>x</sub>	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan

V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m <sup>3</sup>	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System