TECHNICAL MEMORANDUM

1. Introduction

Project Title: 3685 South Vermont Avenue

Environmental No.: ENV-2019-56-EAF

Project Location: 3685 South Vermont Avenue, Los Angeles, CA (Project Site or Site)

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750, Los Angeles, CA 90012

Applicant: Bethune Hotel Ventures., LLC
10573 West Pico Boulevard, Suite 213
Los Angeles, CA 90064

Prepared By: City of Los Angeles

Pursuant to the California Environmental Quality Act (CEQA), a Final Environmental Impact Report (EIR) was prepared and certified for the South Los Angeles Community Plan (referred to in this document as "SLA" or "Community Plan"). The Final EIR document is hereinafter referred to as the "Certified EIR" or "Program EIR."

This document is a technical memorandum that has been prepared to evaluate potential project-specific environmental effects associated with the proposed project to be developed at the Project Site (described in detail in subsection 1.3, below) ("3685 South Vermont Avenue Project" or "Project"). Specifically, this technical memorandum addresses CEQA Guidelines Section 15168(c), which sets forth criteria to use a program EIR for "later activities" within the scope of a program EIR.

1.1 South Los Angeles Community Plan Location

The South Los Angeles Community Plan Area (CPA) is located approximately three miles southwest of Downtown Los Angeles with a total area of approximately 9,881 acres (approximately 15.4 square miles), inclusive of streets and other public rights-of-way. Approximately 7,272 acres of the CPA is developable land. South Los Angeles is characterized by diverse neighborhoods including Angelus Vista, Adams-Normandie, University Park, Exposition Park, Vermont Square, Vermont-Slauson, Manchester Square, Vermont Knolls, Gramercy Park, and Vermont Vista. It is generally bounded by Pico Boulevard to the north, Figueroa Street and Broadway to the east, 120th Street to the south, and Arlington Avenue and Van Ness Avenue to the west. The South Los Angeles CPA is bordered by the Wilshire and Westlake CPAs to the north, the Harbor Gateway CPA and the County of Los Angeles community

of West Athens-Westmont to the south, the West Adams-Baldwin Hills-Leimert CPA and City of Inglewood to the west, and the Southeast Los Angeles CPA to the east.

1.2 South Los Angeles Community Plan

The City of Los Angeles General Plan is composed of the following state mandated elements: Conservation, Housing, Land Use, Open Space, Noise, Safety, and Circulation (Mobility). In addition to the seven state mandated elements, the City's General Plan includes these other optional elements: Air Quality, Infrastructure Systems, Plan for a Healthy Los Angeles Element, and Public Recreation Plan. Lastly, the City's General Plan includes the Framework Element, which provides a strategy for long-term growth, guiding individual Community Plans and other citywide elements. The South Los Angeles and the Southeast Los Angeles Community Plans are two of the 35 Community Plans, which comprise the Land Use Element of the City's General Plan. The Proposed Plans are intended to promote an arrangement of land uses and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the CPAs. The Proposed Plans will also improve the link between land use and transportation in a manner that is consistent with the General Plan Framework Element, the Citywide growth strategy. The objectives, policies, and programs of the Proposed Plans are specific, action-oriented ideals which the City will promote during the lifespan of the Proposed Plans. The Proposed Plans describe the capacity for future development for a portion of the City. Adoption of the Proposed Plans would result, for portions of the CPAs, in changes to zoning and height districts, changes to land use designations, and amendments to development regulations and standards, consistent with the General Plan, to enhance the unique character of the neighborhoods, and accommodate projected growth in South Los Angeles and Southeast Los Angeles Community Plans. More specifically, the Proposed Plans include the adoption of the South Los Angeles Community Plan Implementation Overlay (CPIO) District and the Southeast Los

The Proposed Plans are part of the Department of City Planning's (DCP's) New Community Plan Program and are comprehensive updates of the existing South Los Angeles Community Plan and the Southeast Los Angeles Community Plan, two of the City's 35 Community Plans. Both the South Los Angles and Southeast Los Angeles Community Plans were last updated in March 2000. The updated community plans are intended to guide development through 2035. The project includes amending both the policy document and the land use map of the community plans and adoption of several zoning ordinances to implement the updates. These zoning ordinances take a number of different forms, including amendments for zone and height district changes and the adoption of two CPIO Districts. To ensure consistency between the updated community plans and the other City plans and ordinances, the Proposed Project also includes amendments to the Framework and Circulation Elements of the City's General Plan, the Housing Incentive Ordinance and others as necessary. The underlying purpose and one of the primary objectives of the Proposed Plans is to accommodate future growth in the City, including in the Community Plan Areas (CPAs) consistent with the City's growth strategies. With the implementation of the Proposed Plans, the land use designations of the CPAs would be revised to accommodate population growth and housing and employment demand projected by the Southern California Association of Governments (SCAG) through the year 2035, as well to meet the other project objectives listed below:

The primary objectives for the SLACP are as follows:

• Accommodate projected population, housing, and employment consistent with the growth strategies of the Framework Element, including by locating growth in transit centers and corridors, encouraging a jobs/housing balance near transit centers, and preserving existing residential neighborhoods.

• Provide housing for all income levels, especially low-income households. Discourage the displacement of existing residents and communities.

• Adopt a plan that is consistent with policies and objectives of Senate Bill (SB) 375 and the policies of the Sustainable Communities Strategies.

• Revitalize existing commercial corridors.

• Reduce residential/industrial land use conflicts.

• Promote a vibrant economy, including by addressing over-concentrated uses and incentivizing targeted uses, and preserving industrial land for employment.

• Improve the function and design of residential, commercial, and industrial areas.

The Secondary Objectives of the Proposed Plans are to:

• Increase public health by: encouraging a built environment that promotes an active lifestyle; increasing the number of healthy food outlets; providing greater access to quality health care services; and minimizing exposure to pollutants and noxious uses.

• Foster an environmentally sustainable City by promoting green building practices.

• Conserve the existing scale and character of residential neighborhoods. South Los Angeles and Southeast Los Angeles Community Plans.

• Identify and protect historic resources. • Update land use and zoning to create consistency and remove outdated language, as well as reduce complex, contradictory and unnecessary regulatory conditions.

With the adoption and implementation of the Proposed Plans, new housing and employment opportunities would be created mostly in commercial areas and around transit stations, in accordance with the Framework Element's policy to focus growth in higher-intensity commercial centers close to transportation and services. The Proposed Plans establish policies for the protection of residential neighborhoods. Most residential neighborhoods in the CPAs, including established single-family neighborhoods, are not expected to change significantly due to the plan updates. The character of existing single-family and lower-density neighborhoods would be preserved by maintaining lower density land use designations, limiting the allowed residential density of some neighborhood commercial areas, and establishing design guidelines. New development capacity would be directed towards transit-oriented areas and commercial corridors, and away from existing residential neighborhoods. The commercial areas of the CPAs would support new development that accommodates a variety of uses and encourages pedestrian

activity, creating focal points and activity centers for surrounding neighborhoods. Established industrial areas would generally be preserved for future industrial use and would continue to serve as a valuable source of employment and revenue to the CPAs.

1.3 Project Description

1.3.1 Project Setting

The Project would be located at 3685 South Vermont Avenue (Project Site), within the South Los Angeles Community Plan (Community Plan) area of the City of Los Angeles. The Project Site is a flat vacant lot, approximately 33,400 square feet (0.77 acres). The site has a street frontage of approximately 185 feet along the west side of Vermont Avenue and 183 feet along the north side of the West 37th Street. West 37th Street terminates in a cul-de-sac at the southwestern portion of the subject site and a walkway extends from the cul-de-sac to Vermont Avenue along the southern boundary of the site. The subject property is zoned C2-2D-CPIO with a Community Commercial land use designation with corresponding zones of C2, C4, RAS3, R3, RAS4, and R4 within the South Los Angeles Community Plan Area. This subject site is also located within the North University Park-Exposition Park-West Adams Neighborhood Stabilization Ordinance (NSO) District (ZI-2397), the Los Angeles State Enterprise Zone (ZI-2374), the City of Los Angeles Transit Priority Areas (ZI-2452), Local Emergency Temporary Regulations – Time limit and Parking Relief – LAMC16.02.1 (ZI-2498), The Exposition/University Park Redevelopment Project (ZI-2488), the South Los Angeles Alcohol Sales Specific Plan (ZI-1231), and the South Los Angeles Community Plan Implementation Overlay (CPIO) District (ZI-2484). The subject site is within the TOD High Subarea of the South Los Angeles Community Plan Implementation Overlay (CPIO) District.

1.3.2 Project Description

The Applicant proposes the construction of a seven-story, 75-foot tall 168-room hotel building totaling 102,069 square feet in floor area with a Floor Area Ratio ("FAR") of 3:1, including 4,067 square foot of ground floor retail, and 5,708 square feet of open space. The project will provide 70 parking spaces at-grade (20 parking spaces) and subterranean parking level (50 parking spaces) and 40 bicycle parking spaces including 20 short-term and 20 long-term spaces.

Design

The project is for the development of a new 7-story, 75-foot tall, 168-room hotel building with a proposed Floor Area ("FAR") of approximately 3:1 and 102,069 square feet of floor area including 4,067 square feet of ground floor retail, and 5,708 square feet of open space. The primary pedestrian entrance to the project is located along Vermont Avenue, the primary frontage. The project will provide a total of 84 vehicular parking spaces in an enclosed grade-level parking (22 parking spaces) and a subterranean level parking (62 parking spaces) that is accessed from the South Vermont Avenue at the northeast of the project. The project provides 40 bicycle parking spaces including 20 short-term and 20 long-term spaces.

The project includes a gradual stepped profile along the west property, which fronts a residential neighborhood. All exterior open spaces and terraces with activity only front active street areas directing noise away from the residential neighborhood.

<u>Bulk/Massing</u>

The proposed project is development of a new seven-story, 75-foot tall, 168-room hotel building, totaling 102,069 square feet including 4,067 square feet of ground floor retail, and 5,708 square feet of open space. The project site is zoned C2-2D-CPIO and is located in the South Los Angeles Community Plan Implementation Overlay District (CPIO), Subarea G: TOD High that limits the FAR to 4:1 for the hotel uses. The building design incorporates changes in building plane, varied rooflines, recesses, open-air-walkways, and balconies, patio, deck and canopy to add architectural interest to the building and creates distinct breaks in the building plane. Together, these elements are applied to create sufficient breaks in plane and articulation. Therefore, the project is designed and oriented to be compatible with surrounding properties.

Building Materials

The building design incorporates changes in building plane, varied rooflines, recesses, open-air-walkways, and balconies, patio, deck and canopy to add architectural interest to the building and creates distinct breaks in the building plane. These breaks are further differentiated with a variety of building materials that include GFRC panels, phenolic panels, integrated color stuccos, storefront glazing system, woodwall soffit, and wood screen. Together, these elements are applied to create sufficient breaks in plane and articulation. In accordance with the Community Plan Design Guidelines, changes in building materials are applied purposefully to modulate the building façade.

Entrances

The project site has frontages along South Vermont Avenue and West 37th Street. The hotel building has a street-oriented entrance along South Vermont Avenue (the Primary Lot Line) and is augmented with design features that establishes a strong visual connection to Vermont Avenue. Vehicular access to Project Site, including loading and unloading of trucks, is provided via one driveway on South Vermont Avenue that was reviewed and approved by LADOT. Access from Vermont Avenue would be a right turn-in only.

Setbacks

The project site has frontages along South Vermont Avenue and 37th Street. The project provides a strong street wall with 11-foot setbacks along South Vermont Avenue and 37th Street as allowed by code. The project will provide substantial landscaping along the setbacks to enhance the streetscape and create a pedestrian friendly environment. The project provides a 5-foot landscape buffer between the project site and the westerly abutting residential used to the rear.

Parking/Loading

The project will provide a total of 84 vehicular parking spaces in an enclosed grade-level parking (22 parking spaces) and a subterranean level parking (62 parking spaces) that is accessed via one driveway on the South Vermont Avenue and will accommodate right-turn only ingress and egress movements. The driveway is beneath the larger building mass at the northeast of the project, and it is integrated into the architecture and massing of the building and appears as a defined and articulated opening at grade. All on-grade parking is hidden behind the building mass, as well as screening elements along the north property line. The loading dock will be located in the parking garage on the ground floor. The driveway will comply with LADOT standards ensuring that adequate area would be provided within the parking garage to accommodate the vehicle and truck turning maneuvers.

Lighting

The project will provide lighting fixtures that are harmonious with the building design. As conditioned, all pedestrian walkways and vehicle access points will be well-lit and all outdoor lighting provided on-site will be shielded to prevent excessive illumination and spillage onto adjacent public rights-of-way, adjacent properties, and the night sky.

Landscaping/Open Space

The project provides 5,631 square feet landscape area. On-site landscaping is provided in the form of a 5-foot landscape buffer along the abutting residential property to the west, 3-foot landscape buffer along the abutting church property to the north, 11-foot setback along South Vermont Avenue to the east and 11-foot setback along 37th Street, a dog park at the ground floor and landscape planters at the third and seventh floor exterior terraces facing the southern property line in order to reduce the urban heat island effect. The project will remove fifteen (15) existing on-site trees with more than 8" Diameter trunk and will maintain the seven (7) existing non-protected street trees along the public right-of-way. The project is proposing twenty-one (21) new trees (140% of required). The project will provide substantial landscaping along the setbacks to enhance the site and help buffer from surrounding uses.

Trash Collection

The project will provide trash storage and collection to be enclosed in the ground floor parking garage, where it will not be visible from public view from the street. Trash collection can only be accessed from the driveway on the South Vermont Avenue. The trash storage and collection shall not interfere with traffic on any public street, as conditioned.

Access

Vehicular access is strategically placed to prioritize the pedestrian experience. Vehicular access to parking is placed from 37th Street, minimized to one entrance for the ground level located along South Vermont Avenue, and sized minimally to meet City requirements and provide usability.

Sustainability Features

The Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2019 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations).

1.3.3 Discretionary and Ministerial Actions and Approvals for the Project

1. Pursuant to Los Angeles Municipal Code Sections 12.24.W.24 and 16.05.C, the applicant requests a Conditional Use Permit to allow a 168-room Hotel located within 500 feet of a Residential zone, and a Site Plan Review for a development project which creates, or results in an increase of, 50 or more guest rooms, in the C2-2D-CPIO zone.

2. Construction permits, including building, grading, excavation, foundation, temporary street closure, and associated permits.

3. Other discretionary and ministerial permits and approvals that may be deemed necessary.

2. Regulatory Framework

2.1 CEQA Guidelines Section 15168 – Program EIR

2.1.1 CEQA Guidelines Section 15168 Overview and Requirements

CEQA Guidelines Section 15168(a) defines a program EIR as:

> [A]n EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
>
> (1) Geographically,
>
> (2) As logical parts in the chain of contemplated actions,
>
> (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
>
> (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

CEQA Guidelines Section 15168(c) sets forth criteria to use a program EIR for "later activities." Specifically, CEQA Guidelines Section 15168(c) states the following:

(c) Use with Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

> (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR a provided in Section 15152.
>
> (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
>
> (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
>
> (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to

determine whether the environmental effects of the operation were within the scope of the program EIR.

2.1.2 Applicability of CEQA Guidelines Section 15168 to the Project

The SLA EIR meets the definition under Guidelines Section 15168(a) because it analyzed all subsequent development related geographically in the South Los Angeles Community Plan project area and the Community Plan Implementation Overlay Zone that would foreseeably occur from the adoption of the SLACP, and that development was found to have similar impacts which could be mitigated in similar ways.

The EIR for the SLA Plan fully analyzed the potential environmental effects associated with the City's adoption of the South Los Angeles Plan and subsequent development within the SLA plan area. As provided in the SLA EIR.

As discussed below, the Project is fully consistent with the SLA and within the scope of the SLA EIR.

The Project is consistent with the uses, density, and intensity contemplated by the General Plan and zoning, and analyzed in the SLA EIR. The proposed land use and intensity of the Project is consistent and compatible with the surrounding area and typical for an infill development located near transit and on a major City thoroughfare.

3. Environmental Impact Analysis

The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously certified EIR. The conclusions of the Certified EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the Certified EIR.

Consistent with CEQA Guidelines Section 15168, a modified Environmental Checklist Form was used to compare the anticipated environmental effects of the Project with those disclosed in the Certified EIR and to review whether any of the conditions set forth in Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162, requiring preparation of a subsequent or supplemental EIR, have been triggered. This analysis provides the following information as to each of the impact thresholds analyzed in each of the impact categories:

Impact Determination in the EIR. This column sets forth the impact determination made in the Certified EIR for each impact threshold.

Any Substantial Changes Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts? Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this column indicates whether the changes represented by the Project will result in new significant impacts that have not already been considered and mitigated by the measures in the Certified EIR or a substantial increase in the severity of a previously identified impact.

Any Substantially Changed Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts? Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been substantial changes to the circumstances under which the Project is undertaken (e.g., changes to the Project Site or vicinity) that have occurred subsequent to the preparation of the Certified EIR, which would result in the Project having a new significant environmental impact or a substantial increase in the severity of a previously identified impact.

Any New Information of Substantial Importance? Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Program EIR was certified is available, shows that: (A) the Project will have one or more significant effects not discussed in the Certified EIR; or (B) that significant effects previously examined will be substantially more severe than shown in the Certified EIR; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the Project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives, which are considerably different from those analyzed in the Certified EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. New studies completed as part

of this environmental review are attached to this technical memorandum or are on file with the Planning Department.

Mitigation Measures Addressing Impacts. Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the mitigations have already been implemented. A "yes" response will be provided in either instance. If "No" is indicated, this environmental review concludes that the impact does not occur with this Project, and therefore no mitigations are needed.

DISCUSSION AND MITIGATION SECTIONS. A discussion of the elements of the checklist is provided under each environmental category in order to clarify and provide support for the answers. The discussion provides information about the particular environmental issue, how the Project relates to the issue, and the status of any mitigation that may be required or that has already been implemented. Applicable mitigation measures from the Certified EIR that apply to the Project are listed under each environmental category.

Conclusions. A discussion of the conclusion relating to the analysis contained in each section.

3.1 Aesthetics

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	Less Than Significant	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less Than Significant	No	No	No	No
(c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Significant and Unavoidable	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant with Mitigation	No	No	No	NO

In 2013, Governor Edmund G. "Jerry" Brown signed SB 743. Among other things, SB 743 adds PRC Section 21099, 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." PRC Section 21099 defines a "transit priority area" as an area within 0.5 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," and an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [L.A. CEQA Thresholds Guide] shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

The Vermont Project is an infill site within the South Los Angeles Community Plan Area that is zoned to allow for commercial uses. The Project Site is also located in a Transit Priority Area (TPA), as defined by Public Resources Code Section 21099, and as designated by its location in Subarea G (TOD High), of the South Los Angeles Community Plan. The Project Site is located within 2,640 feet from the intersection of Exposition Boulevard and Vermont Avenue, which qualifies as a major transit stop as determined by the City. Therefore, the Project is located in a transit priority area, as confirmed by the City of Los Angeles Zoning Information and Map Access System (ZIMAS).[1] As the Project qualifies as an employment center project located in a transit priority area, its aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC 21099.

Based on the above, no new significant aesthetic impacts or a substantial increase in previously identified aesthetic impacts would occur as a result of the Project. Therefore, the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

[1] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 10011 Washington, www.zimas.lacity.org, accessed November 25, 2020.

3.2 Agriculture and Forestry Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(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 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(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	No	No	No	No

3.2.1 Impact Determination in the EIR

The Certified EIR stated that the Plan Area is located in a densely-developed portion of the City that is zoned for urban uses and not for agricultural purposes. Therefore, the Certified EIR

determined that implementation of the Plan would not result in the conversion of farmland to non-agricultural uses. No Williamson Act contracts are applicable to Plan Area, and no loss of farmland would result from the implementation of the Plan.

Mitigation Measures

No impacts related to agricultural and forestry resources were determined for the Plan, and no mitigation measures were required.

3.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As stated in the Certified EIR, the Plan Area contains land use that is zoned for urban uses and not for agricultural purposes. The Project does not propose to change the zoning or land use designation for the Project Site. Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

3.2.3 Any Substantial Changes to the Project or Substantial Changes in New Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

3.2.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to agricultural or forestry resources. No substantial changes have occurred since certification of the EIR, and no new agricultural or forestry resources have been identified within the vicinity of the Project.

3.2.5 EIR's Mitigation Measures Addressing Impact

Because the Certified EIR determined the Project would have no impacts on agricultural or forestry resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no mitigation measures are required.

3.2.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in the severity of previously identified impacts to agricultural or forestry resources would occur as a result of the Project. Therefore, the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.3 Air Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
AIR QUALITY: Would the project:					
(a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact	No	No	No	No
(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?	Significant and Unavoidable	No	No	No	No
(c) Expose sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	No	No	No	No
(d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this technical memorandum:

A Air Quality and Greenhouse Gas Emissions Technical Modeling, DKA Planning, November 2020.

3.3.1 Impact Determination in the EIR

The South Los Angeles Community Plan EIR concluded the following:

Impacts related to conflicting with or obstructing implementation of the applicable air quality plans under the Proposed Plans would be less than significant.

Nonetheless, without mitigation, implementation of the Proposed Plans could result in a significant impact related to localized construction emissions.

There is no potential for the Proposed Plans to generate significant localized CO concentrations at intersections within the CPAs. Furthermore, the Proposed Plans would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, impacts related to regional operational emissions under the Proposed Plans would be less than significant.

Therefore, without mitigation, implementation of the Proposed Plans would result in a significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is designated non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Regional and localized construction emissions could exceed the significance thresholds after the implementation of Mitigation Measure AQ1. Therefore, the Proposed Plans are considered to result in a significant and unavoidable regional and localized construction impact.

Without mitigation, implementation of the Proposed Plans would result in a significant impact related to substantial pollutant concentrations during construction activities.

Mitigation Measure AQ1 would reduce TAC emissions generated by various construction activities, including equipment operation. For example, Tier 4 engines with horsepower ratings between 175 and 750 generate 90 percent less exhaust emissions, including particulate matter, than Tier 2 or 3 engines.30 A reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that a construction project within the CPAs could generate emissions that would exceed the significance thresholds despite Mitigation Measure AQ1, resulting in a significant and unavoidable impact related to exposure of sensitive receptors to substantial pollution concentrations.

Impacts related to operational odors under the Proposed Plans would be less than significant.

3.3.2. Analysis

The following review of potential air quality impacts resulting from the Project is based on the Air Quality Technical Report, which is provided in Appendix A.

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to Air Quality if it would:

a) Conflict with or obstruct implementation of the applicable air quality plan;

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

c) Expose sensitive receptors to substantial pollutant concentrations; or

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

The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following factors for consideration on a case-by-case basis to evaluate a project's construction air quality impacts:

- Combustion Emissions from Construction Equipment
  - Type, number of pieces and usage for each type of construction equipment;
  - Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
  - Emission factors for each type of equipment.
- Fugitive Dust: Grading, Excavation and Hauling
  - Amount of soil to be disturbed on-site or moved off-site;
  - Emission factors for disturbed soil;
  - Duration of grading, excavation and hauling activities;
  - Type and number of pieces of equipment to be used; and
  - Projected haul route.
- Fugitive Dust: Heavy-Duty Equipment Travel on Unpaved Roads
  - Length and type of road;
  - Type, number of pieces, weight and usage of equipment; and
  - Type of soil.
- Other Mobile Source Emissions
  - Number and average length of construction worker trips to project site, per day; and
  - Duration of construction activities.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, construction air quality emissions are evaluated in consideration of the criteria set forth by the SCAQMD. Pursuant to the State *CEQA Guidelines* (Section 15064.7), a lead agency may consider using, when available, significance thresholds established by the applicable air quality management district or air pollution control district when making determinations of significance. For purposes of this analysis, the City has determined to assess the potential air quality impacts of the Project in accordance with the most recent thresholds adopted by the SCAQMD in connection with its *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook,* and subsequent SCAQMD guidance, as discussed below, and this assessment satisfies the considerations raised in the *Thresholds Guide*.[2]

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

The SCAQMD has adopted a series of AQMPs to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. The 2016 AQMP relied on emissions

[2] *While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial land use projects such as the Project. As a result, lead emissions are not further evaluated in this technical report.*

forecasts based on the demographic and economic growth projections provided by SCAG's 2016 in devising its control strategies for reducing emissions of ozone and PM2.5 to meet five NAAQS standards.[3] SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies."[4] The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, the lead agency assess whether the project would directly obstruct implementation of the plan by impeding the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5) and whether it is consistent with the demographic and economic assumptions (typically land use related, such as employment and population/residential units) upon which the plan is based.[5] Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment.[6]

The Project would not obstruct implementation of the 2016 AQMP for, as discussed below, its construction and operational emissions would be less than significant. The Project would comply with applicable required fleet rules and control strategies to reduce on-road truck emissions (i.e., 13 CCR, Section 2025 [CARB Truck and Bus regulation]), and other applicable SCAQMD rules specified and incorporated in the 2016 AQMP. Projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. As discussed below, compliance with the applicable required fleet rules and control strategies and requirements would render it consistent with, and meet or exceed, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Thus, the Project's criteria pollutant emissions would not cause the Air Basin's criteria pollutant emissions to worsen so as to impede the SCAQMD's efforts to achieve attainment with respect to any criteria pollutant for which it is currently not in attainment of the NAAQS and CAAQS (e.g., ozone, PM10, and PM2.5),[7] or to cause the Air Basin to deteriorate from its current attainment status with respect to any other criteria pollutant emissions.

As further discussed below, the Project is also affirmatively consistent with the 2016 AQMP. The Project incorporates into its design appropriate control strategies set forth in the 2016 AQMP for achieving its emission reduction goals, and would be consistent with the demographic and economic assumptions upon which the plan is based.

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3 *SCAQMD, 2016 AQMP, pages ES-6, 3-1, 3-3, 3-10, 3-17.*

4 *SCAQMD, 2016 AQMP, page 4-42.*

5 *SCAQMD, Air Quality Analysis Handbook, 1993, pages 12-2, 12-3, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook. Accessed January 2019.*

6 *SCAQMD, CEQA Air Quality Handbook, page 12-1.*

7 *The Los Angeles County portion of the Air Basin is designated as nonattainment for the federal lead standard; however, this was due to localized emissions from two lead-acid battery recycling facilities in the City of Vernon and the City of Industry that are no longer operating. For reference see South Coast Air Quality Management District, Board Meeting, Agenda No. 30, Adopt the 2012 Lead State Implementation Plan for Los Angeles County, May 4, 2012.*

(i) Construction

(a) Control Strategies

During its construction phase, the Project would ensure compliance with CARB's requirements to minimize short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. The Project incorporates Tier 4 Final equipment consistent with PDF AQ1 requirements to use diesel-fueled construction equipment to be retrofitted with after treatment products and to use the cleanest available technology. Compliance with these features and requirements would be consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

(b) Growth Projections

The Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region, since construction workers are typically drawn from an existing regional pool who travel among construction sites within the region. Construction workers are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

(ii) Operations

(a) Control Strategies and Policy Consistency

The Project design and land uses render it consistent with the 2016 AQMP during operations. The 2016 AQMP includes transportation control strategies from the 2016 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. The majority of these strategies are to be implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, although some can be furthered by individual development projects.

The Project location, design, and land uses would support land use and transportation control strategies related to reducing vehicle trips for patrons and employees by increasing commercial density near public transit. The Project is considered an "urban infill" Project, as it would replace existing vacant property within an already developed urban area. The Project is accessible to and well served by public transit including frequent and comprehensive transit services. Job growth, as a result of the completed Project, would be focused in a high-quality transit area (HQTA), which SCAG defines as an area within a half mile of a well-serviced transit stop. The Project's urban location setting, located within a quarter mile of the LA Metro Expo/Vermont rail station, and its land use characteristics are analyzed below using the methodology used by CAPCOA in its guidance document entitled *Quantifying Greenhouse Gas Mitigation Measures*, to demonstrate that the Project would result in reduced VMT, and reduced associated transportation-related air pollutant emissions, as compared to the statewide and Air Basin averages.[8] This analysis

[8] *California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, 2010, http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf. Accessed January 2018.*

provides evidence of the Project's consistency with the 2016 AQMP's goal of reducing mobile source emissions as a source of NO_X and PM2.5.

The location of the Project Site is consistent with and would not conflict with the Urban location setting in the CAPCOA guidance document shown to reduce VMT per capita as compared to the Statewide average from 48 percent in central Berkeley to 82 percent in the North Beach area of San Francisco.[9] The Project Site shares virtually all of the characteristics listed by CAPCOA for the Urban location setting, including a location close to the central business district, an area rich in jobs, and readily available high quality transit options.[10] The land use characteristics of the Project listed below are consistent with and would not conflict with those shown in the CAPCOA guidance document to reduce vehicle trips to and from the Project Site as compared to the Statewide and Air Basin averages. They would, therefore, also result in corresponding reductions in VMT and associated air pollutant and GHG emissions in accordance with the CAPCOA methodologies.

- **Increased Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. This characteristic corresponds to CAPCOA guidance strategy LUT-1.[11] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban location settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban[12] location, therefore this characteristic applies to the Project. The Project would increase the Project Site density to approximately 93 employees.[13]
- **Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an Urban area, Compact Infill, or Suburban Center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an Urban setting, up to 30 percent in a Compact Infill setting, or up to 10 percent in a Suburban Center for land use/location strategies.[14] This characteristic corresponds to

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9 *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, page 59.*

10 *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, page 59.*

11 *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, pages 155-158.*

12 *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, pages 59-60. The Project area meets the characteristics for an urban setting as the project is located within the South Los Angeles Community Plan Area and located near office, retail, university, and residential uses.*

13 *Supplemental Memorandum regarding Vehicle Miles Traveled, prepared by Gibson Transportation Consulting, Inc., December 17, 2019.*

14 *CalEEMod, by default, assumes that trip distances in the South Coast Air Basin are slightly longer than the Statewide average. This is due to the fact that commute patterns in the South Coast Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in the Southern California Association of Governments 2016-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The RTP/SCS shows that, even under future Plan conditions, upwards of 52 percent of all work trips would be 10 miles or longer (SCAG, Performance Measures Appendix, p. 13, 2016). The RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 52 percent since the goal of the RTP/SCS is to reduce overall per capita VMT in the region. It is thus reasonable to assume that the trip distances in South Coast Air Basin are analogous to the statewide*

CAPCOA guidance strategy LUT-2.[15] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the geographic location of a project within the region. The Project Site represents an Urban location within the City of Los Angeles. The Project Site is served by existing high quality public transportation located within a quarter-mile. The Project Site is within an active urban center with many existing off-site commercial and residential buildings. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the Statewide and South Coast Air Basin averages and would result in corresponding reductions in transportation-related emissions.

- **Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance strategy LUT-4.[16] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to a downtown or major job center. The Project would be located in an area that offers access to multiple other nearby destinations including restaurant, bar, office, retail, Los Angeles Memorial Coliseum, University of Southern California (USC), and residential uses. The Project Site is also located near other job centers in the region. Ready access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the Statewide and South Coast Air Basin averages, and encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related emissions.
- **Increased Transit Accessibility:** Locating a project with high density near transit facilitates the use of transit by people traveling to or from the Project Site. This characteristic corresponds to CAPCOA guidance strategy LUT-5.[17] According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings (also potentially for rural settings adjacent to a commuter rail station with convenient access to a major employment center) for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near a project. The Project would be located within a quarter-mile of public transportation, including the Metro Expo Line and Metro Local Lines 102, 204, 550, 754, Dash Southeast, and Dash Downtown F. The Project would provide access to on-site uses from existing pedestrian pathways. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide and South Coast Air Basin averages, encourage walking and non-automotive forms of

average given that the default model trip distances in the South Coast Air Basin are slightly longer but still generally similar to the statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the South Coast Air Basin average.

[15] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, pages 159-161.*

[16] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, pages 167-170.*

[17] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, pages 171-175.*

transportation, and would result in corresponding reductions in transportation-related emissions.

As described above, by locating the new hotel and retail uses within an area that has existing high quality public transit (with access to existing regional bus and rail service), housing, USC, restaurants and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Los Angeles, the Project would reduce vehicle trips and VMT, and resulting air pollutant emissions.

(b) Growth Projections

The Project is anticipated to be fully operational in 2023. The Project's growth would also be consistent with the growth projections contained in the 2016 RTP/SCS. The Project would result in an increase of up to 93 employees and would comprise 0.38 percent of SCAG's year 2023 estimated increase of 24,695 jobs within the City.[18,19] As such, the Project would have a very small effect on the overall employment projections for the City. Therefore, the increases in employment would be consistent with SCAG's 2016 RTP/SCS goals and would be consistent with the growth projections contained in SCAG's 2016 RTP/SCS, which form the basis of the growth projections in the 2016 AQMP.

As discussed above under Methodology, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality reductions identified in the AQMP.[20] **The Project would also be consistent with the growth projections in the 2016 AQMP, since the growth would occur in a High Quality Transit Area and a Transit Priority Area, resulting in highly transportation-efficient growth, which would minimize growth in transportation-related emissions. Impacts would be less than significant.**

(c) General Plan Air Quality Element

The City's General Plan Air Quality Element includes Citywide policies that are related to air quality. The Project, as discussed above, would achieve several goals, policies and objectives of the Air Quality Element by locating its development in an urban infill area and by establishing a land use pattern that promotes sustainability. As described above, the Project would contribute to a land use pattern that addresses employment needs but at the same time reduces vehicle trips and air pollutant emissions by locating jobs and retail within an identified Transit Priority Area that has multiple public transit options (with access to existing regional bus and rail service), and residential opportunities, restaurants and entertainment, all within walking distance. **As described in Table 5 of the Air Quality Technical Report, the Project would be consistent**

[18] *Employees based on Supplemental Memorandum regarding Vehicle Miles Traveled, prepared by Gibson Transportation Consulting, Inc., December 17, 2019.*

[19] *SCAG Adopted 2012 RTP Growth Forecast; http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting; accessed August 2019.*

[20] *SCAQMD, CEQA Air Quality Handbook, page 12-1.*

with and not conflict with, applicable air quality policies of the General Plan's Air Quality Element and impacts would be less than significant.

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;

The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and occupancy (long-term). Based on the following analysis, construction would result in less than significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for construction criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS (i.e., ozone precursors of VOCs and NOx, PM10, and PM2.5). Operation of the Project would result in less than significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for operational criteria air pollutant emissions in which the region is non-attainment under the CAAQS or NAAQS (i.e., ozone precursors of VOCs and NOx, PM10, and PM2.5). As shown below, construction and operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2).

(iii) Regional Construction

Construction of the Project has the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

The maximum daily construction emissions for the Project were estimated for each construction phase. The maximum daily emissions are predicted values for a representative worst-case day, and do not represent the actual emissions that would occur for every day of construction, which would likely be lower on many days. As stated above, in order to provide a conservative emissions analysis, for modeling purposes, construction emissions were modeled beginning in 2021. Detailed emissions calculations are provided in Appendix A Air Quality Technical Report.

The results of the criteria pollutant calculations are presented in **Table 17**, *Estimated Maximum Regional Construction Emissions*, and include dust control measures required to be implemented by SCAQMD Rule 403 (Control of Fugitive Dust), Particulate Emissions control measures required under SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants), and fugitive VOC control measures required to be implemented to reduce emissions from soil through SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and from architectural coating emission factors based on SCAQMD Rule 1113 (Architectural Coatings). As shown in Table 17, construction-related daily emissions would not exceed the SCAQMD numeric indicators of significance and emissions levels would be below

the applicable numeric indicators. **As the Project's maximum regional emissions from construction would be below the regional numeric indicators, regional construction emissions impacts would be less than significant.**

TABLE 17
ESTIMATED MAXIMUM REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) [A]

Source	VOC	NO_X	CO	SO_2	PM10[b]	PM2.5[b]
Site Preparation	<1	1	6	<1	<1	<1
Grading/Excavation	2	54	25	<1	8	3
Drainage/Utilities/Trenching	<1	2	4	<1	<1	<1
Foundations/Concrete Pour	<1	2	16	<1	<1	<1
Building Construction	<1	2	10	<1	1	<1
Paving	<1	2	9	<1	<1	<1
Architectural Coatings	42	<1	2	<1	<1	<1
Building Construction, Paving, and Architectural Coatings	42	4	21	<1	1	0
Maximum Daily Emissions	**42**	**54**	**25**	**<1**	**8**	**3**
SCAQMD Numeric Indicators	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A Air Quality Technical Report.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2019.

(iv) Regional Operations

Mobile, stationary, and area source operational regional criteria pollutant emissions were calculated for the Project's buildout year of 2023. Reductions in building energy and resource consumption due to physical and operational Project characteristics for which sufficient data is available to enable quantification have been included in the quantitative analysis, and include, but are not limited to, characteristics such as the installation of energy efficient appliances and reduced building energy usage sufficient to meet the Title 24-2019 standard. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Detailed emissions calculations are provided in Appendix A Air Quality Technical Report.

Daily trip generation rates for the Project were provided by the Project specific traffic study.[21] The VMT include reductions attributable to the Project characteristics, as discussed previously.

Natural gas usage factors are based on recreational and retail data from the California Energy Commission, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

The results of the regional criteria pollutant emission calculations for VOC, NO_X, CO, SO_2, PM10, and PM2.5 are presented in **Table 18,** *Estimated Maximum Regional Operational Emissions.* The

[21] *Gibson Transportation Consulting, Inc., 2019. Draft Transportation Impact Study for the 3685 S. Vermont Avenue Hotel Project, Los Angeles, CA. July.*

Project's operational-related daily emissions would not exceed the SCAQMD numeric indicators for any criteria pollutants. **As the Project's maximum regional emissions from operational activities would be below the regional numeric indicators, regional construction emissions impacts would be less than significant.**

TABLE 18
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS FOR WEST SITE IN 2024 (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Proposed Project						
Area (Coating, Consumer Products, Landscaping)	2	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	3	4	24	<1	6	2
Total Project	5	5	24	<1	6	2
SCAQMD Numeric Indicators	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A Air Quality Technical Report.

SOURCE: ESA, 2019.

c) Expose sensitive receptors to substantial pollutant concentrations; or

(v) Localized Construction

As explained above, the localized construction air quality analysis was conducted using the methodology prescribed in the SCAQMD *Final Localized Significance Threshold Methodology* (June 2003, revised July 2008).[22] The screening criteria provided in the *Final Localized Significance Threshold Methodology* were used to determine localized construction emissions thresholds for the Project. The maximum daily localized emissions for each of the construction phases and the localized significance thresholds are presented in **Table 19**, *Estimated Maximum Localized Construction Emissions.* The same phasing, equipment assumptions, and compliance with SCAQMD Rule 403 and Rule 1113, were used as for the regional emissions calculations discussed above. As shown below, maximum localized construction emissions for sensitive receptors would be below the localized screening indicators for NO_X, CO, PM10, and PM2.5, therefore, with respect to localized construction emissions, impacts to sensitive receptors would not be potentially significant. **As the Project's maximum localized construction emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, and PM2.5, Project-construction emission impacts to sensitive receptors would be less than significant.**

TABLE 19
ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10 [b]	PM2.5 [b]
Site Preparation	1	5	<1	<1
Grading/Excavation	1	15	2	1
Drainage/Utilities/Trenching	2	4	<1	<1
Foundations/Concrete Pour	2	15	<1	<1

[22] *SCAQMD, Final Localized Significance Threshold Methodology.*

Source	NO_X	CO	PM10 [b]	PM2.5 [b]
Building Construction	1	8	<1	<1
Paving	2	8	<1	<1
Architectural Coatings	<1	2	<1	<1
Building Construction, Paving, and Architectural Coatings	2	17	<1	<1
Maximum Localized (On-Site) Emissions	2	17	2	<1
SCAQMD Screening Numeric Indicator [c]	**67**	**599**	**4.3**	**2.6**
Exceed Screening Numeric Indicator?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A Air Quality Technical Report.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

[c] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 1-acre site with sensitive receptors conservatively assumed to be located adjacent to the construction area.

SOURCE: ESA, 2019.

(vi) Localized Operational

The localized operational air quality analysis was conducted using the methodology prescribed in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008). The screening criteria provided in the Localized Significance Threshold Methodology were used to determine the localized operational emissions numerical indicators of significance for the Project. The same assumptions, including compliance with the Title 24 (2019) building energy efficiency standards, CALGreen Code, and City of Los Angeles Green Building Code, were used in the analysis. The maximum daily localized emissions and the localized significance thresholds are presented in **Table 20,** *Estimated Maximum Localized Operational Emissions*. **As the Project's maximum localized operational emissions would not exceed the localized numeric indicators for NO_X, CO, PM10, or PM2.5, operational emissions impacts to sensitive receptors would be less than significant.**

TABLE 20
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10	PM2.5
Area (Coating, Consumer Products, Landscaping)	<1	<1	<1	<1
Energy	<1	<1	<1	<1
Total Localized (On-Site) Emissions	<1	<1	<1	<1
SCAQMD Screening Numeric Indicator [b]	**67**	**599**	**2**	**0.8**
Exceeds Screening Numeric Indicator?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C-1 Air Quality Technical Report.

[b] The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County Costal) for a 1-acre site with sensitive receptors conservatively assumed to be located adjacent to the Project Site for operational emissions for LST purposes.

SOURCE: ESA, 2019.

(vii) Carbon Monoxide Hotspots

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted

by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

CO levels in the Project Site Area are substantially below the Federal and the State standards. Maximum CO levels in recent years were 2.0 ppm (one-hour average) and 1.7 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin for some time,[23] and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.[24] Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix A Air Quality Technical Report. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[25] Therefore, projects that result in traffic at any intersection of less than 100,000 vehicles per day would be considered to be less than significant.

Based on the Project specific traffic study, under Cumulative plus Project conditions (2023), the intersection of Vermont Avenue and Adams Boulevard would have a maximum traffic volume of approximately 71,720 ADT under the Project buildout scenario. Total traffic volumes at the maximally impacted intersection would likely have to more than double under both buildout scenarios to cause or contribute to a CO hotspot impact, given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling.[26] As the Project does not result in 100,000 vehicles per day at any study area intersection, this comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. **The Project would not contribute to the formation of CO hotspots and no further**

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[23] *SCAQMD, Final 2012 AQMP, page 2-22.*

[24] *SCAQMD, 2003 AQMP, Appendix V: Modeling and Attainment Demonstrations, page V-4-24.*

[25] *The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.*

[26] *SCAQMD, 2003 AQMP, Chapter 6 Clean Air Act Requirements, http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/2003-aqmp. Accessed May 2018.*

CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

(viii) Toxic Air Contaminants

(a) Construction

Temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. According to the Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (August 2003), health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary and short-term construction schedule (24 months), the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of construction activities.

As discussed above, the Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would 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, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The nearest residential air quality sensitive receptors are located adjacent to the Project Site to the north and west.

With its incorporation of PDF AQ1, the Project would be required to utilize off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards and would substantially reduce TAC emissions, in the form of DPM emissions, from construction equipment. The Tier 4 standards reduce DPM emissions by approximately 81 to 96 percent as compared to equipment that meet the Tier 2 off-road emissions standards, depending on the specific horsepower rating of each piece of equipment. Thus, construction activities would not expose sensitive receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be less than significant.

(b) Operational

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[27] Project operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance activities that would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. Furthermore, Project trucks would be required to comply with the applicable provisions of the CARB 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM and NO_X emissions from existing

[27] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003, http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc?sfvrsn=2. Accessed February 2019.*

diesel trucks. Therefore, Project operations would not be considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of toxic air contaminants from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. There are no anticipated stationary sources of TACs. With respect to the use of consumer products and architectural coatings, the retail and hotel uses associated with the Project would be expected to generate minimal emissions from these sources. The Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD numerical indicator of significance. Therefore, operational impacts would be less than significant.

Thus, construction and operation would not expose sensitive receptors to substantial toxic air contaminant concentrations and impacts would be less than significant.

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

(ix) Construction

Potential activities that may emit odors during construction include the use of architectural coatings and solvents, as well as the combustion of diesel fuel in on-and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the Project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, which was updated in 2015 with new exposure parameters including age sensitivity factors. Through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Furthermore, construction emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). **Therefore, construction activities would result in less than significant impacts with respect to other emissions, including those leading to odors.**

(x) Operational

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD

Rule 402. Furthermore, operational emissions would not exceed the SCAQMD regional significance thresholds for attainment, maintenance, or unclassifiable criteria air pollutants (i.e., CO and SO_2). **Therefore, operation of the Project would result in less than significant impacts with respect to other emissions, including those leading to odors.**

3.3.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant air quality impacts beyond those already identified in the Certified EIR. Instead, the Project's impacts with respect to air quality were determined to be less than significant, which is less than the significant and unavoidable impacts identified in the Certified EIR.

3.3.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to air quality. No substantial changes in the environment have occurred since certification of the EIR, and no substantial pollutant emissions or concentrations have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

3.3.5 EIR's Mitigation Measures Addressing Impacts

As stated above, the Certified EIR included PDF AQ1 to address impacts with respect to air quality during the construction of specific projects. While the analysis provided above demonstrates that implementation of the Project would not require any mitigation measures related to air quality, the Project would nevertheless implement PDF AQ1 from the Certified EIR.

3.3.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to air quality would occur as a result of the Project. Therefore, the impacts to air quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.4 Biological Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	No	No	No	No

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
(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	No	No	No	No

3.4.1 Impact Determination in the EIR

Due to the fully urbanized character of the CPAs, and lack of active rare, endangered or threatened habitats within or near the CPAs, it is unlikely that a candidate, sensitive, or special status species may be impacted directly or through habitat modification as a result of the Proposed Plans. The CPAs are fully urbanized and the dense urban development that has occurred over the years has greatly impacted natural vegetation areas. There are no undeveloped natural open space areas within or near the CPAs.

Implementation of the Proposed Plans would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS because open space areas, which are most likely to provide sufficient undisturbed habitat to support candidate, sensitive, or special status species, are not being changed by the Proposed Plans. Compliance with the Tree Preservation Ordinance would ensure that there would be no net loss of protected trees in the CPAs. Therefore, impacts related to species identified as a candidate, sensitive, or special status species are less than significant. Thus, it is unlikely that there are any endangered species within the Plan Area. Therefore, the Certified EIR determined that implementation of the Plan would result in no impact with respect to biological resources.

Mitigation Measures

No impacts were identified related to biological resources. Therefore, no mitigation measures were required.

3.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site is approximately 0.78 acres (33,762 square feet) and is currently vacant. As stated above, the majority of the Plan Area is fully urbanized. As the Project Site is vacant, development of the Project would not result in the removal of any habitat. Therefore, the Project

would not result in new significant impacts related to candidate, sensitive, or special status species.

In addition, there are no riparian areas located on or adjacent to the Project Site. Therefore, the Project would result in no impact with respect to riparian habitats.

There are no wetlands or water features on the Project Site. Therefore, the Project would have no impact with respect to wetlands.

The 14 existing pine trees on site would be removed as part of the Project. These trees would be replaced in accordance with the existing tree replacement requirements of the City's Division of Urban Forestry. There are 5 Jacaranda trees and 2 Washingtonia palms in the public right of way that would remain in place and be protected during Project construction. There are no City of Los Angeles protected trees located on the Project Site. All existing trees will be removed as a result of the Project. The Project would include landscape planting of a minimum of 14 trees to replace the 14 existing pine trees on site. Therefore, the Project would not conflict with any tree preservation policy or ordinance and therefore no impact would occur.

Finally, as stated in the Certified EIR, there are no species identified within the Plan Area that are protected by the Endangered Species Act, and no applicable habitat conservation plans. Therefore, the Project would also result in a no impact related to habitat conservation plans.

Mitigation Measures

None required.

3.4.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts with respect to biological resources beyond those already identified in the Certified EIR.

3.4.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment related to biological resources have occurred since certification of the EIR, and no substantial new biological resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

3.4.5 Mitigation Measures Addressing Impact

Because the EIR determined the Project would have no impact with respect to biological resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.4.6 Conclusion

Based on the above, no new significant impacts to biological resources or a substantial increase in previously identified biological resource impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.5 Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	Significant and Unavoidable	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant With Mitigation	No	No	No	Yes
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	No	No	No	No

3.5.1 Impact Determination in the EIR

Historic Resources

According to the Certified EIR, the Plan does not intend to affect designated historical resources (e.g., HCMs) or reasonably expect to incentivize development of properties with designated historical resources. The Plan includes plan standards that further protect historical and potentially historical resources by requiring additional review by either the Cultural Heritage Commission or the Office of Historic Resources for projects located on sites with historical resources designated at the federal, state, or local level and potentially historical resources identified in the City of Los Angeles' SurveyLA report, as updated. For informational purposes, when compared to current processes, the Plan is expected to have a neutral or beneficial impact to designated historical resources and a beneficial impact to non-designated resources, due to these plan standards.

The Plan incorporates changes that will assist in further protecting both designated and eligible historic resources (including a new process that requires historical resource review of projects involving properties in SurveyLA), and the City has an existing regulatory framework for the protection of historical resources. However, it is possible that demolition and/or significant alteration to some of the historical resources identified in the Certified EIR may occur. Therefore, impacts from implementation of the Plan related to historic resources would be significant and unavoidable, as identified in the Certified EIR.

Archaeological and Paleontological Resources

The Plan Area is highly disturbed, and any archeological resources that may have existed at the

surface have likely been disturbed by past development. Therefore, the uppermost sediments are not anticipated to contain substantial amounts of archeological resources. Under the Proposed Plans, future development that would include ground-disturbing activities that would go beyond man-made fills is expected to occur primarily in the Active Change Areas (in CPIO Subareas). Therefore, impacts related to Archaelogical and Paleontological resources would be potentially significant. Mitigation Measures CR1 and CR2, provided below, were proposed to reduce impacts related to archaeological resources to a less than significant level.

Human Remains

The Plan Area is highly urbanized and has been heavily disturbed and developed. Unmarked cemeteries or graves have likely been disturbed by past development. Given the Mission-associated Native American history of the Los Angeles Basin, and the practice to bury people outside Mission grounds in informal cemeteries, the potential to unearth human remains during excavation and grading activities exists. However, in accordance with California Health and Safety Code Section 7050.5, if any human remains are encountered during construction, the City will require that work in the immediate area of the find be halted and the Los Angeles County Coroner be contacted. It was found that no further disturbance will occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition. If the remains are determined to be those of a Native American, the Native American Heritage Commission in Sacramento shall be contacted before the remains are removed in accordance with PRC Section 21083.2. Therefore, the Certified EIR determined that implementation of the Plan would result in a less than significant impact related to human remains.

Mitigation Measures

The following Mitigation Measures were included in the Certified EIR to reduce impacts related to cultural resources:

> **CR1:** Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that if during construction activities any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately and the project applicant shall notify the City. A qualified archeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site. If the find were determined to be significant by the archeologist, the City and the archeologist would meet to determine the appropriate course of action. All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.
>
> **CR2:** Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that during excavation and grading, if paleontological resources are uncovered, all work in that area

shall be halted immediately and the project applicant shall notify the City. The project applicant shall retain a paleontologist to assess the nature, extent, and significance of any cultural materials that are encountered and to recommend appropriate methods to preserve any such resources. Said paleontologist will have the authority to put a hold on grading operations and mark, collect and evaluate any paleontological resources found on the site where it is discovered during construction. Said paleontologist shall be provided a reasonable amount of time to prepare and implement protection measures coordinating with the City of Los Angeles Building and Safety Department. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.

3.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Historic Resources

The Project Site is currently vacant and there are no historic resources on the Project Site. The Project Site is not located within an Historic Preservation Overlay Zone (HPOZ) and is not within close proximity to a HPOZ. The South Los Angeles and Southeast Los Angeles Community Plans EIR identifies historic cultural monuments within these plan areas. The closest historic cultural monuments to the Project Site are the Olin Hall of Engineering, which is located approximately 0.5 miles to the southeast of the Project Site, on the USC campus and the Korean Independence Memorial Building located on Jefferson Boulevard approximately 2 miles to the northeast of the Project Site. As a result, the Project would have no direct or indirect impacts on known historical resources in the Project vicinity.

Archaeological Resources and Human Remains

The Project would be located in an urbanized area on a Site that has been previously developed. While unlikely, it is possible that unknown archaeological resources or human remains could exist at the Project Site and could be encountered during excavation for the proposed subterranean parking levels. Therefore, the Project would be subject to Mitigation Measures CR1and CR2, which would minimize impacts in the event archaeological resources are encountered during construction. In addition, the Project would comply with existing regulations, such as California Health and Safety Code Section 7050.5, which would minimize impacts in the event any human remains are encountered during construction. Therefore, the Project's impacts would be less than significant and the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The Project would implement Mitigation Measures CR1 and CR2 from the Certified EIR.

3.5.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant cultural resources impacts beyond those already identified in the Certified EIR.

3.5.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since certification of the EIR, and no substantial new cultural resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

3.5.5 Mitigation Measures Addressing Impact

As stated above, the Project would implement Mitigation Measures CR1 and CR2 from the Certified EIR. Implementation of these measures would ensure that the Project's impacts with respect to archaeological resources are less than significant. No additional mitigation measures are required.

3.5.6 Conclusion

Based on the above, no new significant impacts to cultural resources or a substantial increase in previously identified cultural resource impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.6 Energy

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
ENERGY: 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?	Less Than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No	No	No	No

3.6.1 Impact Determination in the EIR

Electricity

As stated in the Certified EIR, the estimated increase in demand for electricity resulting from the Proposed Plan represents less than one percent of total electricity supplied by the LADWP in 2010. New development occurring from anticipated development under the Proposed Plan would be subject to Title 24, Part 6 of the California Administrative Code, the Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires local jurisdictions to use energy efficient appliances, weatherization techniques, and efficient cooling and heating systems to reduce energy demand stemming from new development. In addition, development occurring from the implementation of the Proposed Plan would be required to comply with the City of Los Angeles' Green Building Code Energy Efficiency requirements. Consequently, as projects are built in the change areas, they will be in compliance with all applicable energy conservation plans and policies of the City. Therefore, implementation of the Proposed Plan would result in less than significant impacts related to electricity.

Natural Gas

As discussed in the Certified EIR, implementation of the Proposed Plan could result in demand for natural gas in to increase by approximately 156,612 cubic feet per day). This is a three percent increase in natural gas usage compared to 2010. The estimated increase in demand for natural gas resulting from the Proposed Plans represents approximately two percent of total natural gas supplied by the LADWP in 2010.

SoCalGas' total supply capacity is nearly 2.7 trillion cubic feet per year. Of the total supply capacity by SoCalGas, 534 billion cf was consumed in 2010 in the SoCalGas service territory, or 20.1 percent of total supply capacity. Thus, the total remaining supply capacity of SoCalGas is approximately 2.7 trillion cubic feet per year. The total expected increase in natural gas usage in the Proposed Plan area is 4,930,156 cubic feet per day and therefore, would consume less than 0.01 percent of SoCalGas' remaining supply capacity.

Mitigation Measures

Impacts related to energy were determined to be less than significant. Therefore, no mitigation measures were required.

3.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Wasteful, Inefficient, or Unnecessary Consumption of Energy

This analysis relies on Appendix F of the CEQA Guidelines. In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and
- The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

In accordance with Appendix G and the *L.A. CEQA Thresholds Guide,* the following six factors will be considered in determining whether this threshold of significance is met:

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

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Each of these factors is discussed in detail below, under "Project Impacts."

Project Impacts

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

Construction

Electricity

Construction activities would consume relatively minor quantities of electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators would be used during construction.

The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, construction electricity usage would replace the electricity usage associated with the existing buildings. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Natural Gas

Construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities, and thus there would be no natural gas demand during construction of the Project.

Transportation Energy

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate

matter and other TACs. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[28] In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repowering of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Operation

Electricity

Consistent with the Certified EIR, the Project would be served by LADWP and SoCalGas supplies, which have an obligation to serve the Project Site. The project does not propose any changes to the zoning or land use designation for the Project Site, and is therefore consistent with the analysis contained in the Certified EIR.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. Further, the Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Based on the above analysis, the Project's impacts related to the consumption of electricity would be less than significant.

Natural Gas

The Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the

[28] California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

Green Building Ordinance, adequate projected supply and the obligation of SCG to service the Project Site, Project impacts related to natural gas would be less than significant.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As noted previously, the Project Site is located in Transit Priority Area which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Further, extensive public bus and rail transit service is provided within the Project area as a Transit Priority Area site. Transit service in the Project area includes the Metro Expo line stop approximately 0.22 miles north of the project as well as various regional bus lines. Thus, the existing transit services in the vicinity of the Project Site would provide Project residents and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for employees and guests.

During Project operations, vehicles travelling to and from the Project Site are assumed to comply with Corporate Average Fuel Economy (CAFÉ) fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. It is anticipated that the future Project-related 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.

Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. Therefore, Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

Energy consumption during Project operations would be negligible, and energy requirements would be within LADWP's and SoCalGas's service provisions.

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

Electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[29] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.[30] In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be enough to account for future electrical demand by the Project.[31] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) The degree to which the project complies with existing energy standards.

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage would comply with Title 24 standards and CalGreen Code requirements, as well as the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks, and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFÉ fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

5) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's

[29] LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.
[30] Ibid.
[32] California Gas and Electric Utilities, 2017 California Gas Report, 2017.

2017 SLTRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[32] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[33] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, the Project construction and operational activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[34] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would have a negligible effect on the transportation fuel supply.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[35]

6) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The Project's design and proximity to job centers and other commercial, retail, and entertainment uses would allow for more visitors to stay closer to, shopping, and sources of entertainment, reducing associated VMT. The design of the Project, which includes dedicated bicycle parking

[32] California Gas and Electric Utilities, 2017 California Gas Report, 2017.
[33] U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed February 2019.
[34] BP Global, Oil reserves, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed February 2019.
[35] CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed May 7, 2019.

facilities and an improved streetscape with a new hotel and ground floor commercial space that will activate the street frontage, would also encourage non-automotive forms of transportation such as walking or biking to destinations. In addition, extensive public bus and rail transit service is provided within the Project area.

Conclusion

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity, and supplies of natural gas and transportation fuels, would also be sufficient to meet the needs of Project-related construction and operations. During operation, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.

Conflict with or Obstruct Plan for Renewable Energy or Energy Efficiency

The energy conservation plans and policies relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with or obstruct implementation of applicable plans for renewable energy or efficiency.

With regard to transportation related energy usage, the Project would comply with the goals of SCAG's 2020-2045 RTP/SCS, which incorporates VMT targets established by SB 375. The Project's hotel development and proximity to a major job center (Downtown Los Angeles) and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFÉ fuel economy standards. Based on the above, the Project would not conflict with adopted energy conservation plans, or violate State or federal energy standards. Therefore, Project impacts associated with regulatory consistency would be less than significant.

Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Mitigation Measures

None required.

3.6.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant energy impacts beyond those already identified in the Certified EIR.

3.6.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to energy. No substantial changes in the environment related to energy have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

3.6.5 Mitigation Measures Addressing Impact

Because the Certified EIR determined that the Project would have less than significant impacts with respect to energy, no mitigation measures were required. The Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.6.6 Conclusion

Based on the above, no new significant impacts to energy or a substantial increase in previously identified energy impacts would occur as a result of the Project. Therefore, the adoption of the Project does not meet the conditions for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.7 Geology and Soils

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or 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?	No Impact	No	No	No	No
(ii) Strong seismic ground shaking?	No Impact	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	No Impact	No	No	No	No
(iv) Landslides?	No Impact	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(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?	No Impact	No	No	No	No
(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?	No Impact	No	No	No	No
(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?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant With Mitigation	No	No	No	Yes

3.7.1 Impact Determination in the EIR

Seismic Hazards

As discussed in the Certified EIR, a review of the fault systems of Southern California revealed that no active or potentially active faults traverse the CPAs. Thus, the Plan was found to not cause or accelerate substantial damage to structures or infrastructure, or expose people to substantial risk of loss, injury, or death involving a known earthquake fault. Therefore, the Plan was found to result in no impacts related to fault rupture, as identified in the Certified EIR.

As noted above, the Plan Area is located in the seismically active region of Southern California and would likely be subjected to strong ground shaking during the life of the Plan. While the proposed zoning changes would increase development capacity in the identified change areas of the Plan Area, thereby potentially increasing the number of people and structures exposed to strong seismic ground shaking, the Plan would not cause or accelerate existing geologic hazards. With compliance with the California Building Code (CBC), the Los Angeles Building Code (LABC), and Policy 1.1.6 of the Safety Element of the General Plan, the Plan would not change existing conditions with respect to risks associated with seismic ground shaking. Therefore, the Certified EIR identified no impacts related to ground shaking.

While the Plan would involve change areas, it would not cause or accelerate geologic hazards which are common to areas throughout the City and region due to its seismically active nature. Prior to construction of new structures in liquefaction-prone areas, a site-specific geotechnical evaluation is required as specified by PRC Section 2697 that would specifically address and include measures to minimize liquefaction. Compliance with the CBC, the LABC, and Policy 1.1.6 of the Safety Element of the General Plan would minimize risks associated with existing geology. Therefore, the Certified EIR identified no impacts related to liquefaction.

The Plan would change the zoning of certain properties and could encourage growth in landslide areas; however, the implementation of the Plan would not exacerbate the existing conditions. Each new development within the landslide area would have the potential to contain expansive soils but the Plan would not exacerbate existing conditions. Expansive soils are generally removed during foundation work to avoid structural damage and may have already been removed by previous development. Additionally, the City requires that specific geotechnical reports are required to address geologic and soil issues, such as landslide potential. Compliance with the CBC, the LABC, and Policy 1.1.6 of the Safety Element of the General Plan would minimize risks. Therefore, the Certified EIR identified no impacts related to landslides and/or expansive soils.

Erosion/Loss of Topsoil

Implementation of the Plan was found to increase development capacity in the areas of proposed change, which could result in increased grading and subsequent erosion and loss of topsoil within these areas. However, all future construction within these areas of proposed change that would involve earthwork and grading activities would be required to obtain grading permits from the LADBS that include requirements and standards designed to limit potential impacts related to soil erosion. Projects would also be required to comply with the City's Low Impact Development

Ordinance (See Section 4.7, Hydrology and Water Quality, below). Compliance with the City's codes, regulatory requirements, standard grading and building permit requirements, and the application of best management practices would ensure that potential impacts from erosion or loss of topsoils would be less than significant, as identified in the Certified EIR.

Soil Stability

Future development on marine sedimentary rocks, specifically alluvium, lake, playa, and terrace, is potentially subject to seismically induced settlement and could result in lateral spreading, subsidence, liquefaction, or collapse, particularly around areas which are located in a liquefaction zone and where the water table is high. As previously stated, the City requires the approval of a site-specific geotechnical report, required under PRC Section 2697, for new developments where unstable soils may be indicated. In addition, all earthwork and grading activities require grading permits from the Los Angeles Department of Building and Safety (LADBS) that include requirements and standards designed to limit potential impacts related to soil instability. Compliance with the recommendations of required project-specific geotechnical reports and the LABC, which addresses grading, excavation, and fill, as well as with any specific requirements established by the Los Angeles Department of Public Works (LADPW) and/or the City Engineer would reduce hazards related to unstable soils. Compliance with the CBC, the LABC, and Policy 1.1.6 of the Safety Element of the General Plan (as described in the Regulatory Framework, above) would minimize risks. Therefore, the Certified EIR determined that the Plan would result in no impacts related to geologic conditions.

Expansive Soil

While the Plan may result in redevelopment in areas of expansive soils such as alluvium, it would not create substantial risks to life and property. The City requires the approval of a site-specific geotechnical report, required under PRC Section 2697. In addition, all earthwork and grading activities require grading permits from LADBS. Through compliance with the existing codes and requirements, the Certified EIR determined that the Plan would result in no impacts related to expansive soil.

Septic Tanks

The Plan Area, including the areas of proposed change, is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. Therefore, the Certified EIR determined that no impacts related to soil stability around septic tanks or alternative wastewater disposal system would occur.

3.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Seismic Hazards

The California Geological Survey (CGS) establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones,

which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not located within an Alquist-Priolo Fault Zone. The closest active faults to the Project Site are the Puente Hills Blind thrust 2.3 kilometers from the Project Site. As such, the potential for surface rupture at the Project Site is considered low and impacts would be less than significant.

The Project Site is located in the seismically active Southern California region. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code. The California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to minimize losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. The Project consists of a residential development and does not include any characteristics that would result in the exacerbation of existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. With compliance with existing regulatory requirements, Project impacts associated with seismic ground shaking would be less than significant.

Liquefaction

The Project Site is located in an area designated as liquefiable based on ZIMAS. However existing regulatory compliance measure as previously stated would reduce the Project's impacts with respect to liquefaction to less than significant.

Landslides

The potential for seismically-induced landsliding to occur at the Project Site is not considered to be a hazard due to an absence of slopes at the Project Site. In addition, based on the Seismic Hazards Zone Map of the Beverly Hills Quadrangle, the Project Site is not located within an area that has been identified by the State of California as being potentially susceptible to seismically-

induced landslides. Therefore, potential impacts associated with landslides would be less than significant.

Erosion

The Project Site is completely developed with impervious surfaces, with the exception of limited vegetation. During the Project's construction phase, activities such as excavation for the subterranean parking levels, grading, and site preparation could leave soils at the Project Site susceptible to soil erosion. The Project would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Project Site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil, and impacts regarding soil erosion or the loss of topsoil would be less than significant.

Soil Stability

The Project Site is located in an area designated as liquefiable based on ZIMAS. However existing regulatory compliance measure as previously stated would reduce the Project's impacts with respect to liquefaction to less than significant.

The project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the LABC, impacts related to geologic and soil instability would be less than significant.

Septic Tanks

As stated in the Certified EIR, the Plan Area is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. The Project would connect to the City's existing sewer system and would not require the use of septic tanks for alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur as a result of the Project.

3.7.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant geology impacts beyond those already identified in the Certified EIR.

3.7.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment related to geology and soils have occurred since certification of the EIR, and no areas that are susceptible to geology and soil impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

3.7.5 Mitigation Measures Addressing Impacts

No additional mitigation measures are required.

3.7.6 Conclusion

Based on the above, no new significant geology and soils impacts or a substantial increase in previously identified geology and soils impacts would occur as a result of the Project. Therefore, the impacts to geology and soils as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162.

3.8 Greenhouse Gas Emissions

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
GREENHOUSE GAS EMISSIONS: Would the project:					
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No	No	No	No
(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this Report:

A Air Quality Technical Report, ESA, October 2019.

3.8.1 Impact Determination in the EIR

Estimations of emissions in the Community Plan Areas are presented for the purposes of identifying the magnitude of anticipated emissions that could result from the Proposed Plan in order to inform the public and decisions makers. As shown in the EIR, annual emissions of GHG within the South Los Angeles CPA, based on the 2035 Reasonably Expected Development of the Proposed Plan, would be less than existing emissions by approximately 99,379 MTCO2e per year. Although future conditions reflect increased development and associated energy use, future transportation emissions would be less than existing emissions due to lower vehicle exhaust emissions resulting from increased engine efficiency and cleaner burning fuels. The Proposed Plans would concentrate development around transit, comprise a wide mix of uses, and better accommodate pedestrians and bicyclists. These characteristics are anticipated to reduce per capita GHG emissions associated with cars and light trucks. The Proposed Plans would be consistent with AB 32, SB 375, and the 2016-2040 RTP/SCS, regional and local strategies to reduce GHG, and can be expected to contribute to reductions in per capita GHG emissions when viewed at the regional level. Therefore, impacts related to GHG emissions under the Proposed Plans would be less than significant.

3.8.2 Analysis

The following review of potential greenhouse gas impacts resulting from the Project is based on the Greenhouse Gas Technical Report, prepared by Environmental Science Associates (ESA), which is included in Appendix A of this memorandum.

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to GHG's if it would:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Amendments to Section 15064.4 of the State *CEQA Guidelines* were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments to Section 15064.4 do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)).

The California Natural Resources Agency has also clarified that the Guidelines Amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[36]

Although GHG emissions can be quantified, CARB, SCAQMD, and the City have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the Project. The Governor's Office of Planning and Research (OPR) released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[37] Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation

[36] *See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pages 11-13, 14, and 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.*

[37] *Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.*

programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project."[38]

As indicated above, the *CEQA Guidelines* were amended in response to SB 97. In particular, the *CEQA Guidelines* were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per State *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[39] To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[40] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."[41]

Thus, State *CEQA Guidelines* Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.[42]

CARB's Climate Change Scoping Plan, SCAG's 2016 RTP/SCS; L.A,'s Green New Deal (Sustainable City pLAn 2019), and the Los Angeles Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the Statewide targets set forth in AB 32 and as expanded by SB 32. Thus, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines

[38] *Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008.*

[39] *California Code of Regulations (CCR), Title 14, Section 15064(h)(3).*

[40] *California Code of Regulations (CCR), Title 14, Section 15064(h)(3).*

[41] *California Code of Regulations (CCR), Title 14, Section 15064(h)(3).*

[42] *See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ABR's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SHC No. 2012041014 (October 2014); SCAQMD Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); SCAQMD Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and SCAQMD Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).*

Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions, including CARB's 2017 Climate Change Scoping Plan, SCAG's 2016 RTP/SCS, L.A.'s Green New Deal (Sustainable City' pLAn 2019), and the Los Angeles Green Building Code.

Construction

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The emissions of GHGs associated with construction of the Project were calculated for each phase of construction activity using CalEEMod and EMFAC. Results of the GHG emissions calculations are presented on **Table 21**, *Estimated Construction Greenhouse Gas Emissions*. As presented therein, construction of the Project is anticipated to generate approximately 911 $MTCO_2e$.

Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. As recommended by the SCAQMD, construction-related GHG emissions were amortized over a 30-year project lifetime in order to include these emissions as part of a project's annualized lifetime total emissions. In accordance with this methodology, the estimated Project's construction GHG emissions have been amortized over a 30-year period and are added to the annualized operational GHG emissions. Amortized annual project emissions result in 30 $MTCO_2e$. Due to the potential persistence of GHGs in the environment, impacts are based on annual emissions and, in accordance with SCAQMD methodology, construction-period impacts are not assessed independent of operational-period impacts, which are discussed in the next section.[43]

TABLE 21
ESTIMATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

	$MTCO_2e$ per Year [a,b]				
Construction Phase	**Onsite**	**Hauling**	**Vendor**	**Worker**	**Total**
Site Preparation	4.31	0.00	0.00	0.46	5
Grading/Excavation	52.50	415.73	0.00	4.13	472
Drainage/Utilities/Trenching	3.42	0.00	0.00	0.69	4
Foundations/Concrete Pour	10.40	0.00	0.00	0.98	11
Building Construction 2021	85.76	0.00	94.31	106.51	403
Building Construction 2022	116.10	–	–	1,928	

[43] *South Coast Air Quality Management District, Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #12, July 29, 2009, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-12/ghg-meeting-12-minutes.pdf. Accessed July 2019.*

			$MTCO_2e$ per Year [a,b]		
Construction Phase	**Onsite**	**Hauling**	**Vendor**	**Worker**	**Total**
Paving	9.47	0.00	0.00	1.84	11
Architectural Coatings 2022	1.28	0.00	0.00	1.38	5
Architectural Coatings 2023	1.92				
Total					**911**
Amortized Emissions (30-years)					**30**

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] CO_2e emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change Fourth Assessment Report: 25 for CH_4 and 298 for N_2O (Intergovernmental Panel on Climate Change, Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, (2007)).

SOURCE: ESA, 2019.

(xi) Operational

The emissions of GHGs associated with the operation of the Project were calculated using CalEEMod and EMFAC as detailed in the Methodology Section. Results of the GHG emissions calculations are presented on **Table 22**, *Estimated Operational Greenhouse Gas Emissions for Buildout Year*. As presented therein, annual operation of the Project is anticipated to generate approximately 1,523 $MTCO_2e$, including the amortized construction emissions.

Daily trip generation rates for the Project were provided by the Project specific traffic study. The VMT include reductions attributable to the Project characteristics, as discussed previously.

Natural gas usage factors are based on recreational and retail data from the California Energy Commission, and landscape equipment emissions are based on off-road emission factors from CARB. Emissions from the use of consumer products and the reapplication of architectural coatings are based on data provided in CalEEMod.

TABLE 22
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS FOR BUILDOUT YEAR (POUNDS PER DAY) [A]

Source	**$MTCO_2e$**
Area	<1
Energy	340
Mobile	1,102
Waste	24
Water	26
Total Proposed:	1,493
Amortized Construction:	30
Total Project Emissions:	1,523

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A Greenhouse Gas Emissions Technical Report

SOURCE: ESA, 2019.

(xii) Post Buildout Emissions

Executive Orders S-3-05 and B-30-15 establish a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal has not been codified by the Legislature and CARB has not adopted a strategy or regulations to meet the 2050 goal. However, studies have shown that, in order to meet the 2050 goal, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its original 2008 Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[44] In the 2014 Scoping Plan, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[45] The 2017 Scoping Plan recognizes that additional work is needed to achieve the more stringent 2050 target: "While the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 Statewide GHG target (80 percent below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals."[46] For example, the 2017 Scoping Plan acknowledges that "though Zero Net Carbon Buildings are not feasible at this time and more work needs to be done in this area, they will be necessary to achieve the 2050 target. To that end, work must begin now to review and evaluate research in this area, establish a planning horizon for targets, and identify implementation mechanisms."[47]

- **Energy Sector:** Continued improvements in California's lighting, appliance, and building energy efficiency programs and initiatives, such as the State's building energy efficiency standards and zero net energy building goals, would serve to reduce the Project's emissions level.[48] Additionally, further technological improvements and additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[49]
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[50]
- **Water Sector:** The Project's emissions level will be reduced as a result of further enhancements to water conservation technologies.[51]

[44] *California Air Resources Board, Climate Change Scoping Plan, December 2008, page 117.*

[45] *California Air Resources Board, First Update, May 2014, page 32.*

[46] *California Air Resources Board, California's 2017 Climate Change Scoping Plan, October 2018.*

[47] *California Air Resources Board, California's 2017 Climate Change Scoping Plan, October 2018.*

[48] *California Air Resources Board, First Update, pages 37-39 and 85.*

[49] *California Air Resources Board, First Update, pages 40-41.*

[50] *California Air Resources Board, First Update, pages 55-56.*

[51] *California Air Resources Board, First Update, page 65.*

- **Waste Management Sector:** Plans to further improve recycling, reuse, and reduction of solid waste will beneficially reduce the Project's emissions level.[52]

The GHG Emissions Technical Analysis was prepared determine the potential GHG impacts associated with the Project. Due to the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the Project's impacts relative to the 2050 goal is speculative for purposes of CEQA. Due to the uncertainty regarding specific State and local actions that will be implemented to achieve the 2050 GHG emission reduction targets, calculating Project emissions levels for 2050 would be highly speculative. Nonetheless, Statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at buildout represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included within the 2017 Climate Change Scoping Plan, the SCAG 2016 RTP/SCS, the L.A.'s Green New Deal (Sustainable City pLAn 2019), and Los Angeles Green Building Code.

(xiii) CARB's Climate Change Scoping Plan

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (AB 32) and codified into law in AB 32. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in AB 32.

In support of AB 32, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the Project. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the

[52] *California Air Resources Board, First Update, page 69.*

Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[53] It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

Table 23, *Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of GHG-reducing strategies applicable to the Project. The analysis describes the consistency of the Project with these laws and strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

TABLE 23
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN GREENHOUSE GAS REDUCTION STRATEGIES

Sector / Source	Category / Description	Consistency Analysis
Energy		
CCR, Title 24, Building Standards Code	Energy Efficiency Standards for Residential and Nonresidential Buildings	**Compliant.** The Project would meet or exceed the applicable requirements of the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code or applicable version at the time of building permit issuance.
California Green Building Standards Code Requirements	All bathroom exhaust fans shall be ENERGY STAR compliant.	**Compliant.** The Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances, including ENERGY STAR compliant bathroom fans.
	HVAC Systems will be designed to meet ASHRAE standards.	**Compliant.** The Project would utilize energy efficiency HVAC Systems that would meet or exceed the applicable energy standards in ASHRAE 90.1-2013 Appendix G and the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version of these standards at the time of building permit issuance.
	Energy commissioning shall be performed for buildings larger than 10,000 square feet.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements.
	Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code for the use of HFCs in HVAC systems.
	Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Long-term and short-term bike parking shall be provided for up to five percent of vehicle trips.	**Compliant.** The Project would meet this requirement by providing up to 40 bicycle parking spaces as part of its compliance with the City's requirements and the CALGreen Code.

[53] *California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhous Gas Emissions from Projects Subject to the California Environmental Quality Act, (2008).*

Sector / Source	Category / Description	Consistency Analysis
	Stormwater Pollution Prevention Plan (SWPPP) required.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Indoor water usage must be reduced by 20% compared to current California Building Code Standards for maximum flow.	**Compliant.** The Project would meet this requirement, as part of its compliance with the City's requirements, and the CALGreen Code.
	All irrigation controllers must be installed with weather sensing or soil moisture sensors.	**Compliant.** The automatic irrigation system that would be installed as part of the Project would include irrigation controls that would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Wastewater usage shall be reduced by 20 percent compared to current California Building Standards.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements, and the CALGreen Code.
	Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	**Compliant.** The Project would meet or exceed this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Requires documentation of types of waste recycled, diverted or reused.	**Compliant.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
Water		
CCR, Title 24	Title 24 includes water efficiency requirements for new residential and non-residential uses.	**Compliant.** The Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances, including ENERGY STAR compliant bathroom fans.
Other Sources		
Climate Action Team (CAT) works to coordinate Statewide efforts to implement global warming emission reduction programs and the State's Climate Adaptation Strategy.	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project would be consistent with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than 5 minutes at any given time. This would also be applicable to the Project without Reduction Features scenario since the underlying Airborne Toxic Control Measure (ATCM) that limits heavy-duty diesel motor vehicle idling (Title 13 California Code of Regulations [CCR], Section 2485) was adopted by CARB in 2004.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** The Project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.
	Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for guests and employees. The Project would reduce VMT as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including off-site residential, retail, and entertainment.

Sector / Source	Category / Description	Consistency Analysis
	Reduce energy use in private buildings.	**Consistent.** The Project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.

SOURCE: ESA, 2019.

As described above in Table 23, the Project would comply with the applicable laws and regulations that serve to reduce GHG emissions. In addition to the Project's consistency with applicable GHG reduction laws and strategies, the Project would not conflict with the future anticipated Statewide GHG reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.[54] The Project would benefit from Statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. As previously discussed, the utility provider for the Project, LADWP, currently provides 30 percent of electricity via renewable sources, but has committed to providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036.[55,56] As these targets were determined prior to the passage of SB 100, LADWP would also be required to comply with the RPS goals as discussed above in subsection 2.a)(2)(d).[57] The Project would use energy-efficient appliances and equipment (e.g., ENERGY STAR rated), and water efficient fixtures. The Project would also benefit from Statewide efforts towards increasing the fuel economy standards of vehicles. The Project would support reducing VMT given its location at an infill site close to existing transit options (including the Metro Expo Line and Metro Local Lines 38, 102, 200, 204, 550, 754, LADOT DASH all within walking distance).

The 2017 Scoping Plan (adopted in December 2017) also outlines strategies to reduce GHG emissions to achieve the 2030 target from sectors that are not directly controlled or influenced by the Project, but nonetheless contribute to Project-related GHG emissions. For instance, the Project itself is not subject to the Cap-and-Trade regulation; however, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade, and the LCFS. The 2017 Scoping Plan

[54] *Energy + Environmental Economics, Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015, https://www.arb.ca.gov/html/fact_sheets/e3_2030scenarios.pdf. Accessed October 2018.*

[55] *California energy Commission, Utility Annual Power Content Labels for 2017, July 2018. https://ww2.energy.ca.gov/pcl/labels/2017_labels/LADWP_2017_PCL.pdf. Access July 2019.*

[56] *LADWP, 2017 Power Strategic Long-Term Resource Plan, page ES-18.*

[57] *Note that LADWP will incorporate the targets of SB 100 into the upcoming 2018 Power Strategic Long-Term Resource Plan (see: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-renewableenergypolicy?_afrWindowId=qgysh2515_1&_afrLoop=61924918578548&isNoLocale=true&_afrWindowMode=0&_adf.ctrl-state=qgysh2515_4).*

also calls for the doubling of the energy efficiency savings, including utility demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan.[58] While CARB is in the process of expanding the regulatory framework to meet the 2030 reduction target based on the existing laws and strategies in the 2017 Scoping Plan, the Project would support or not impede implementation of these potential GHG reduction strategies identified by CARB for all the reasons summarized in Table 23, above.

Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrate that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study or not currently feasible at the time the 2017 Scoping Plan was adopted could enable the State to meet the 2050 targets.[59] For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, but that this type of policy would be necessary to meet the 2050 target.

With Statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's GHG emissions to decline from their opening year levels as reported in Table 22 as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

Based on the analysis above, the Project would be consistent with CARB's Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan) and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the State's GHG reduction targets for 2030 and 2050. Therefore, impacts are less than significant.

(xiv) SCAG's 2016 RTP/SCS

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including the 2016 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions.

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[58] *California Energy Commission, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016.*

[59] *Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 2015; Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, pages 158-172, (2015). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the State's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.*

At the regional level, the 2016 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of the SCAG 2016 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, certified on April 7, 2016, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375."[60] The 2016 RTP/SCS seeks "improved mobility and accessibility… to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."[61] The 2016 RTP/SCS seeks to implement "strategies focused on compact infill development, superior placemaking (the process of creating public spaces that are appealing), and expanded housing and transportation choices."[62] As part of the 2016 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand."[63] Moreover, the 2016 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016 RTP/SCS would "supports sustainable growth through a more compact, infill, and walkable development pattern."[64]

In order to assess the Project's potential to conflict with the 2016 RTP/SCS, this section analyzes the Project's land use characteristics for consistency with the strategies and policies set forth in SCAG 's2016 RTP/SCS to meet GHG emission-reduction targets set by CARB. Generally, projects are considered consistent with applicable City and regional land use plans and regulations, such as SCAG's 2016 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed below, the Project would be consistent with the 2016 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016 RTP/SCS.

Consistent with 2016 SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in employment, and travel demand. As

[60] *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-37.*

[61] *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 160.*

[62] *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 14.*

[63] *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-35.*

[64] *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-36.*

discussed below, the Project Site is an infill location close to jobs, housing, shopping and entertainment uses and in close proximity to existing public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. As discussed below, the Project Site's land use characteristics demonstrate that the Project's trip generation would be reduced compared to a standard non-infill project and based on its location efficiency. The Project would concentrate new neighborhood-serving commercial retail and hotel uses within an HQTA in an urban infill location in proximity to multiple public transit stops. The Project would also provide bicycle parking for Project employees and guests as well as sidewalks around the perimeter of the Project Site that allow pedestrian access, which would support active transportation options and transit access, including access to the Metro Expo Line and Metro Local Lines 38,102,200,204,550,754, and LADOT DASH. The Project's specific location and close proximity to high-quality transit and other off-site retail, restaurant, entertainment, and residential destinations, all within walking distance, support the conclusion from this analysis that that the Project has been properly located so that its development would achieve a reduction in VMT better than the City and Statewide averages. As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016 RTP/SCS, which are based on changing the region's land use and travel patterns in the following key areas:

- Compact growth in areas accessible to transit;
- Locate jobs and housing in proximity to transit;
- Locate housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

As described above, SCAG has established land use strategies which lead to reduced VMT; the CAPCOA guidance document provides emission reduction values for recommended GHG reduction strategies, including land use strategies.[65] Consistency with the guidance is equitable to consistency with the strategies laid out in the 2016 RTP/SCS.

The Project location, design, and land uses would support land use and transportation control strategies related to reducing vehicle trips for patrons and employees by increasing commercial density near public transit. The Project is considered an "urban infill" Project, as it would replace existing vacant property within an already developed urban area. The Project is accessible to and well served by public transit including frequent and comprehensive transit services. Job growth, as a result of the completed Project, would be focused in a high-quality transit area (HQTA), which SCAG defines as an area within a half mile of a well-serviced transit stop. The Project's urban location and its land use characteristics are analyzed below using the methodology used by CAPCOA in its guidance document entitled Quantifying Greenhouse Gas Mitigation Measures, to demonstrate that the Project would result in reduced VMT, and reduced associated

[65] *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).*

transportation-related air pollutant emissions, as compared to the statewide and Air Basin averages.

CAPCOA has provided guidance on mitigating or reducing emissions from land use development projects in its guidance document entitled Quantifying Greenhouse Gas Mitigation Measures, which provides emission reduction values for recommended air pollutant reduction strategies.

The location of the Project Site is consistent with and would not conflict with the Urban location setting in the CAPCOA guidance document shown to reduce VMT per capita as compared to the Statewide average from 48 percent in central Berkeley to 82 percent in the North Beach area of San Francisco. The Project Site shares virtually all of the characteristics listed by CAPCOA for the Urban location setting, including a location close to the central business district, an area rich in jobs, and readily available high quality transit options. The land use characteristics of the Project listed below are consistent with and would not conflict with those shown in the CAPCOA guidance document to reduce vehicle trips to and from the Project Site as compared to the Statewide and Air Basin averages. They would, therefore, also result in corresponding reductions in VMT and associated air pollutant and GHG emissions in accordance with the CAPCOA methodologies.

- **Increased Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. This characteristic corresponds to CAPCOA guidance strategy LUT-1. According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban location settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location, therefore this characteristic applies to the Project. The Project would increase the Project Site density to approximately 93 employees.
- **Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an Urban area, Compact Infill, or Suburban Center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an Urban setting, up to 30 percent in a Compact Infill setting, or up to 10 percent in a Suburban Center for land use/location strategies. This characteristic corresponds to CAPCOA guidance strategy LUT-2. According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the geographic location of a project within the region. The Project Site represents an Urban location within the City of Los Angeles. The Project Site is served by existing high quality public transportation located within a quarter-mile. The Project Site is within an active urban center with many existing off-site commercial and residential buildings. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the Statewide and South Coast Air Basin averages and would result in corresponding reductions in transportation-related emissions.
- **Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance strategy LUT-4. According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore this characteristic applies to the Project. According to the CAPCOA guidance,

factors that contribute to VMT reductions under this characteristic include the distance to a downtown or major job center. The Project would be located in an area that offers access to multiple other nearby destinations including restaurant, bar, office, retail, Los Angeles Memorial Coliseum, and residential uses. The Project Site is also located near other job centers in the region. Ready access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the Statewide and South Coast Air Basin averages, and encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related emissions.

- **Increased Transit Accessibility:** Locating a project with high density near transit facilitates the use of transit by people traveling to or from the Project Site. This characteristic corresponds to CAPCOA guidance strategy LUT-5. According to CAPCOA, the reduction in VMT from this characteristic applies to Urban and Suburban settings (also potentially for rural settings adjacent to a commuter rail station with convenient access to a major employment center) for residential, retail, office, industrial, and mixed-use projects. The Project is located in an Urban location within an identified Transit Priority Area, therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near a project. The Project would be located within a quarter-mile of public transportation, including the Metro Expo Line and Metro Local Lines 38,102,200,204,550,754, and LADOT DASH. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide and South Coast Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

As described above, by locating the new hotel and retail uses within an area that has existing high quality public transit (with access to existing regional bus and rail service), housing, restaurants and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Los Angeles, the Project would reduce vehicle trips and VMT, and resulting GHG emissions. Therefore, by developing a land use pattern that promotes sustainability, the Project's characteristics developed at its location would achieve many of the objectives of SCAG's 2016 RTP/SCS.

As discussed in the above analysis and below in **Table 24**, *Consistency with Applicable SCAG 2016 RTP/SCS Actions and Strategies*, the Project would be consistent with and support the goals and benefits of the 2016 RTP/SCS that are potentially applicable to the Project. As a result, the Project would be consistent with, and would not conflict with, applicable 2016 RTP/SCS actions and strategies to reduce GHG emissions.

TABLE 24
CONSISTENCY WITH APPLICABLE SCAG 2016 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	**Consistent.** This action applies to local jurisdictions, COGs, SCAG and County Transportation Commissions (CTCs). While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would comply with the City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the parking facility.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	**Consistent.** While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements including through sidewalks around the perimeter of the Project Site that allow pedestrian access and 40 long- and short-term bicycle parking spots. The Project would locate commercial uses within an area that has public transit, employment and residential opportunities, restaurants and entertainment all within walking distance.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions, the Project would support this action/strategy by creating an infill development comprised of complementary uses that offer employment and other community-serving opportunities. The Project would support the development of complete communities by co-locating complementary land uses in close proximity to other destinations including job centers, retail, USC, and entertainment. The Project is also located in a walkable area served by frequent and comprehensive transit within a quarter-mile of the Project Site.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions, SCAG	**Consistent.** While this action applies to local jurisdictions and SCAG, the Project would support the development of complete communities by co-locating complementary land uses in close proximity to other destinations including job centers, retail, USC, and entertainment. The Project is also located in a walkable area served by frequent and comprehensive transit within a quarter-mile of the Project Site.
Pursue joint development opportunities to encourage the development of housing and-mixed use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions, CTCs	**Consistent.** While this action applies to local jurisdictions and CTCs, the Project is located within an HQTA and within a quarter mile of Metro; multiple bus and shuttle lines; the regional freeway system; and an established pedestrian grid. Additionally, the Project would co-locate complementary land uses in close proximity to other destinations including job centers, retail, USC, and entertainment.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	**Consistent.** While this action applies to the State and SCAG, the Project would be consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs through infill development. The Project is located within an HQTA and co-locates complementary commercial/restaurant and residential land uses in close proximity to existing off-site commercial and residential uses. The Project is also located in a walkable area served by frequent and comprehensive transit within a quarter-mile of the Project Site.
Transportation Network Actions and Strategies		
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions, SCAG and CTCs, the Project would intensify development in an area directly served by the Metro Expo Line. Furthermore, the Project would provide retail/hotel use in an area with pedestrian access to a large range of entertainment and commercial and housing uses.
Clean Vehicle Technology Actions and Strategies		

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	SCAG, Local Jurisdictions	**Consistent.** While this action applies to local jurisdictions and SCAG, as discussed above, and while directing the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would comply with the City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the parking facility.

SOURCE: ESA, 2019.

(xv) L.A.'s Green New Deal (Sustainability pLAn 2019)

As discussed above, L.A.'s Green New Deal includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: local water, clean & healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, and prosperity and green jobs, among others. The L.A.'s Green New Deal provides information as to what the City will do with buildings and infrastructure in their control. Specific targets related to development, and mobility and transit, include reducing building energy use per square foot for all types of buildings by 22 percent by 2025, reduce vehicle miles traveled per capita by at least 13 percent by 2025, and increase the percentage of zero emission vehicles in the city to 20 percent by 2025. As discussed in **Table 25**, *Consistency with L.A's Green New Deal*, the Project would generally comply with these aspirations. Therefore, the Project would be consistent with the L.A.'s Green New Deal. Table 25 concentrates on goals and targets that are directly applicable to the Project.

TABLE 25
CONSISTENCY WITH L.A.'S GREEN NEW DEAL

Target	Consistency Analysis
Focus Area: Local Water	
Reduce Potable Water use per capita by 22.5% by 2025	The Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances, including ENERGY STAR compliant bathroom fans.
Focus Area: Clean & Healthy Buildings	
All new buildings will be net zero carbon by 2030 Reduce building energy use per square foot for all building types 22% by 2025	The Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances, including ENERGY STAR compliant bathroom fans. The Project would utilize energy efficiency HVAC Systems that would meet or exceed the applicable energy standards in ASHRAE 90.1-2013 Appendix G and the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version of these standards at the time of building permit issuance
Focus Area: Mobility and Transit	

Target	Consistency Analysis
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025. Reduce VMT per capita by at least 13 percent by 2025	The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for guests and employees. The Project would reduce VMT as a result of its urban infill location, with nearby access to public transportation within a quarter-mile of the Project Site, and its proximity to other destinations including off-site residential, retail, and entertainment.
Focus Area: Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the city by 25 percent by 2025.	Project would comply with the City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the parking facility.
Focus Area: Waste and Resource Recovery	
Increase landfill diversion rate to 90 percent by 2025.	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with Citywide recycling targets.
Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service which would participate in City trash services, including separating trash from recycling through the use of blue and green recycling bins provided by the LA Sanitation Department.
Eliminate organic waste going to landfill by 2028.	The Project consists of a hotel development, which would participate in City trash services, including the participation in the organic waste recycling program once the Citywide residential program is implemented.
Focus Area: Urban Ecosystem & Resilience	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.	While this action applies to the City in general, and not specifically to individual private development, the Project would include landscape planting at the ground level, including the installation of street trees to replace existing pine trees that would be removed as part of the Project, as well as landscaping on the third and seventh floor terraces, in order to reduce the urban heat island effect.

SOURCE: City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAn, 2019; ESA, 2019.

(xvi) Los Angeles Green Building Code

The Project would comply with the Los Angeles Green Building Code to reduce GHG emissions by increasing energy-efficiency, reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with the 2019 California Title 24 Building Energy Efficiency Standards, as amended by the City. The Project would also meet the mandatory measures of the CALGreen Code as amended by the City by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the Los Angeles Green Building Code.

In conclusion, the Project's consistency with applicable GHG reduction plans and policies plan as presented through Tables 23 through 25 demonstrate that the Project is consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2016 RTP/SCS, the City's Green New Deal. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to greenhouse gas emissions would be less than significant.

Mitigation Measures

None required.

3.8.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in any new or increased significant impacts with respect to its impact on climate change, and the Project would not conflict with any applicable plan, policy, or regulation with the goal of reducing GHG emissions.

3.8.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

3.8.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined that the Project would have less than significant impacts with respect to greenhouse gas emissions, no mitigation measures were required. The Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.8.6 Conclusion

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR, and no substantial new conditions related to GHG emissions have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts.

3.9 Hazards and Hazardous Materials

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No	No	No	No
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less Than Significant with Mitigation	No	No	No	Yes
(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 with Mitigation	No	No	No	YES
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
(g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this technical memorandum:

E Remedial Action WorkPlan, Stantec, 2021.

3.9.1 Impact Determination in the EIR

Routine Transport, Use, or Disposal of Hazardous Materials

Implementation of the Proposed Plan would decrease the amount of land designated as industrial in the CPA, thereby decreasing the likelihood that new industrial land uses (that would increase the use, transport and disposal of hazardous materials over current existing conditions in the CPA) would be introduced over the life of the plan, and the land that will remain designated as industrial under the Proposed Plan is already developed with industrial uses. While there are currently hazards and hazardous materials within the CPA, they are subject to the federal, state, and local regulations. Therefore, compliance with all applicable local, state and federal regulations would ensure that impacts related to the use, transport and disposal of hazardous materials under the Proposed Plan would be less than significant.

Upset or Accident Conditions

Implementation of the Proposed Plan may result in grading and excavation of sites for future development in the CPA. In some cases, construction activities could expose construction workers and the public to potentially unknown hazardous substances present in the soil or groundwater. Therefore, impacts related to unknown contamination could be potentially significant. Future development projects within the CPA will be required to conform with all applicable environmental regulations related to new construction and hazardous materials storage, use and transport. Potential hazards related to lead, asbestos, methane zones, and underground storage tanks are less than significant with compliance with existing regulations. In addition, development of sites with known contaminants would be required to undergo remediation and cleanup before construction activities could begin.

The Proposed Plan will allow development of sites currently or historically used for industrial uses

that may have used hazardous materials in their operations. Because unknows may exist with regard to existing soil or other contaminants in the areas currently or historically zoned as industrial in the CPA, there is the possibility that future development may uncover previously undiscovered soil and other forms of contamination. While all demolition and construction within the CPA would be required to comply with all local, state and federal regulations, further mitation may be required to reduce risks associated with the potential for unknown toxic substances existing on sites previously occupied by a hazardous materials generating facility and would have the potential to create a significant hazard to the public or the environment unless an environmental site assessment is conducted to determine potential risks and appropriate mitigation. Therefore, without mitigation, the Proposed Plan could result in a potentially significant impact related to unknown hazardous materials before mitigation.

Hazardous Materials Near Schools

Compliance with all applicable local, State, and federal laws and regulations would ensure that hazardous materials do not pose a significant risk to nearby receptors, such as schools. Although the use of hazardous materials in the vicinity of schools is well-regulated, unknowns may exist with regard to existing (contamination) hazards in the CPA within one-quarter mile of a school. Therefore, impacts related to hazardous waste emissions near a school resulting from future development on industrial land in the CPA uncovering existing hazardous waste in soils or on the development site are considered potentially significant. Implementation of Mitigation Measure HM1 would reduce impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment near schools in the CPA.

Listed Hazardous Materials Site

The proposed Plan does not contain plans or policies to locate development on a site identified as having hazardous materials; however, the Plans do not restrict development on contaminated sites, and may even encourage redevelopment in CPIO areas that may contain some listed sites. Therefore implementation of the Proposed Plans could lead to the location of new development on a site which is included on a list of hazardous materials sites. Although future development on a site identified as a site previously occupied by a hazardous materials generating facility could have the potential to create a significant hazard to the public or the environment, development of such sites is well regulated. If contamination at any specific project site were to exceed regulatory action levels, the individual project applicant would be required to undertake remediation procedures prior to grading and development under the supervision of appropriate regulatory oversight agencies (e.g., LAFD, Los Angeles County Environmental Health Division, DTSC, or RWQCB), depending on the nature of any identified contamination.

Consequently, if future development under the Plan is located on a site that is included on a list of hazardous materials sites, remediation would be implemented to reduce or eliminate impacts. Therefore, compliance with all local, state and federal regulations and conditions of approval for all future development projects in the CPA would ensure that contaminated sites undergo remediation activities prior to development activities. Because appropriate site investigation and

remediation activities prior to development is required by law, and because all contaminated sites are required to be remediated prior to development, this impact would be less than significant.

Airport Hazards

The Plan is not located within an airport land use plan. The nearest major general aviation commercial airport to the Plan is LAX, which is located approximately four miles southwest of the South Los Angeles CPA. The nearest general aviation reliever airports to the CPA are the Hawthorne Municipal Airport and the Compton/Woodley Airport. The southern portion of the CPA is within the approach path of all three airports. LAX is the busiest airport with the most risk associated with flight path proximity. While the Plan allows for increased building heights in Active Change Areas, buildings with increased heights built under the Plan would not interfere with flight patterns to LAX, Hawthorne Airport or Compton/Woodley Airports. The Plan is not located in an area designated as an "Airport Hazard Area" subject to the development conditions found in LAMC Section 12.50. Therefore, implementation of the Plan would not result in a safety hazard or be exposed to safety hazards related to the operation of an airport.

There are no private airstrips located in the vicinity of the Plan Area. Therefore, implementation of the Plan would not result in airport safety hazards for people residing or working in the Plan Area, and no impact would occur.

Emergency Response Plan

The Plan would not impair implementation of, or physically interfere with, the State Emergency Plan or the Los Angeles County Operational Area Emergency Response Plan. The City of Los Angeles Department of Transportation (LADOT) and the Los Angeles Fire Department (LAFD) would be responsible for ensuring that the Plan does not impair or physically interfere with an adopted emergency response or evacuation plan. As discussed in Section 4.11, Public Services, of the Certified EIR, designated emergency evacuation and disaster routes within the Plan Area would be maintained. In addition, local policies, such as the City's General Plan Safety Element Policies 1.1.1, 1.1.2, 1.1.3, 2.1.1, and 3.1.1 provide procedures for coordination among City agencies and other jurisdictions to provide mutual assistance in the event of an emergency or natural disaster and establishment of disaster recovery programs. Compliance with these policies would help minimize the potential impact of interference with the County's emergency response plan. Therefore, the Plan was found to result in less than significant impacts related to emergency response plans.

Wildland Fires

The Plan Area is located in a highly-urbanized portion of the City of Los Angeles and is not located in an area identified as a wildland fire hazard area, Selected Wildfire Hazard Areas of the Safety Element. Therefore, implementation of the Plan was determined to not result in impacts to wildland fires.

Mitigation Measures

The following mitigation measure was included in the Certified EIR to reduce impacts related to hazardous materials:

HM1 Any project within a CPIO Subarea that involves construction-related soil disturbance located on land that is currently or was historically zoned as industrial shall ensure that a comprehensive search of databases of sites containing hazardous waste or hazardous materials, including on lists prepared pursuant to Government Code, section 65962.5, is conducted. A report setting forth the results of this database search shall be provided to the City (e.g. historical environmental reports prepared by Enviroscan, EDR or similar firms). If the report indicates the project site or property within onequarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase 1 assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with state standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state, or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state, or local agency. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction of the project site, the REA or relevant agency shall provide written confirmation to the City that such grading or construction may safely proceed. Written confirmation that required site remediation was completed consistent with the relevant federal, state or local requirements shall be provided to the City prior to issuance of certificates of occupancy.

3.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Routine Transport, Use, or Disposal of Hazardous Materials

Construction

The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of commercial buildings (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

In accordance with existing City, State, and federal rules and regulations, including the federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation (40 Code

of Federal Regulations 61 Subpart M), the federal regulations under the Occupational Safety and Health Act (29 Code of Federal Regulations Section 1926.1101), California Occupational Safety and Health Administration (CAL-OSHA) regulations (California Code of Regulations, title 8, Sections 341.15, 1529), and SCAQMD Rule 1403, all materials which are identified as ACMs, would be removed by a trained and licensed asbestos abatement contractor. Generally, asbestos removal is a low risk operation. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited.

Operation

The Project includes demolition and removal of an existing empty lot with remnants of the previous foundation and paved areas, and the construction of a mixed-use, hotel development with 168 rooms with a 5,359 square foot lobby/lounge space, 4,067 square feet of ground floor retail space, 2,453 square feet of meeting space, and 1,473 square feet of recreation areas. and associated parking. The types of hazardous materials that would be found on the Project Site during the operation of the Project would be typically associated with commercial land uses – paints, cleaning supplies, and small amounts of petroleum products. The Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal of small amounts of hazardous materials, compliance with existing local, State, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Therefore, the Project's impacts related to this issue would be less than significant.

Upset or Accident Conditions

On-Site

Listed Hazardous Materials Site

The California Department of Toxic Substances Control (DTSC) maintains the EnviroStor database, which includes identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. The Project Site is listed on the EnviroStor database that is compiled by the Department of Toxic Substances Control.[66]

As indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, any new development occurring on documented hazardous materials sites would have to be preceded by remediation and cleanup under the supervision of the DTSC before construction activities could begin, if such actions have not already occurred. Based on soil sampling and survey, the soil underlying the Project Site contains lead in exceedance of the Department of Toxic Substances Control (DTSC) screening levels. The impacted soil is located at depths ranging from

[66] https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002702. *Accessed May 13, 2019.*

1.5 to 9 feet depending on the location on the Site and therefore remediation of the lead-impacted soil is required. A Remedial Action Workplan (RAW) was prepared by Wood, which would be approved by DTSC, that indicates that remediation would consist of the excavation of 9 feet of soil. Any contaminated soil excavated from the Project Site would be disposed of and remediated in accordance with all applicable regulations. The remediation of lead-impacted soil, while it might occur independently of Project implementation, is evaluated as part of the Project.

As indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, compliance with existing regulations would reduce any impact and ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to the release of hazardous materials into the environment during construction activities on these sites with known, documented contamination. Therefore, impacts related to existing contaminated sites would be less than significant.

Airport Land Use Plan

As stated in the Certified EIR, the Plan Area is not located within an airport land use plan, and is not located less than two miles of an airport. The Project is approximately eight miles from the Los Angeles International Airport. Therefore, the Project would have no impact with respect to airport hazards.

Emergency Response Plan

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Therefore, Project impacts related to emergency response would be less than significant.

Wildland Fires

The Project Site is located in an urbanized area of the City and is completely developed. In addition, the Project Site is not located in a Very High Fire Hazard Severity Zone. Thus, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The Project would comply with Mitigation Measure HM1 from the Certified EIR.

3.9.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts with respect to hazards and hazardous materials beyond those already addressed in the Certified EIR.

3.9.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to hazards and hazardous materials and there are no substantial changes that would result in new or more severe significant environmental impacts.

3.9.5 Mitigation Measures Addressing Impacts

As stated above, the Project would implement Mitigation Measure HM1 from the Certified EIR. Implementation of this measure would ensure that the Project's impacts with respect to hazardous materials are less than significant.

3.9.6 Conclusion

Based on the above, no new significant impacts or a substantial increase in previously identified impacts to hazards and hazardous materials would occur as a result of the Project. Therefore, the impacts to hazards and hazardous materials as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.10 Hydrology and Water Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	No	No	No	No
(iv) Impede or redirect flood flows?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant with Mitigation	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant	No	No	No	No

3.10.1 Impact Determination in the EIR

Mitigation Measure

No mitigation measure was included in the Certified EIR to reduce impacts related to hydrology and water quality as it was found to be less than Significant.

3.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Water Quality

Potential water quality impacts were analyzed for the proposed development at the Project Site. The analysis focused on hydrology and water quality issues as they relate to both surface water and groundwater. The analysis provided below addresses the State CEQA Guidelines Appendix G related to hydrology and water quality.

(a) Hydrology

Using the Appendix G questions regarding hydrology, the Project would have a significant impact if the Project would:

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

result in substantial erosion or siltation on- or off-site;

Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

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

Impede or redirect flood flows

The Project Site is located in an urbanized area and is not within the immediate vicinity of any waterways or other bodies of water. The Project Site is approximately 3.5 miles west of the Los Angeles River and is within the Los Angeles watershed (Wood, 2019). The Site has been previously developed and the former library was demolished. However, remnants of the building foundation and some paved areas are still present on the Site. The remainder of the Site is unpaved with limited landscaping, including shrubs, pine trees, and short grass. The site is relatively flat with a slight slope towards the southwest. Surface water drainage from the site flows into and follows the gutters on surrounding streets (Wood, 2019).

The Project does not propose groundwater withdrawal and would not adversely affect groundwater. As indicated in the Site Characterization Report (Wood, 2019), depth to groundwater in the site vicinity is approximately 170 feet.67 There are no groundwater production wells within or adjacent to the Project Site. Although the Project would increase the amount of impervious surface across the Project Site, given that the Project Site is located in an urban area and was previously developed and that the Project is infill development, the increase in site coverage would not substantially interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, the Project would result in less than significant impacts with regard to groundwater.

During construction the Project would implement erosion control measures to reduce sedimentation and erosion as required by the City's grading permit regulations set forth in LAMC, Chapter IX, Article 1. If construction occurs during the rainy season (October 1 to April 14), a wet weather erosion control plan (WWECP) would be prepared pursuant to the City's adopted Manual and Guideline for Temporary and Emergency Erosion Control. LAMC Section 91.7013 includes regulations pertaining to erosion control and drainage devices, and Section 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection. In 2011, the City a Low Impact Development Ordinance (LID Ordinance), which enforces the requirements of the County Municipal Storm Sewer Systems (MS4) Permit. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. The landscape requirements in LAMC Sections 12.40 through 12.43 would also address runoff, infiltration, and groundwater recharge. In addition, the Project would comply with LAMC Section 64.70, the Stormwater and Urban Runoff Pollution Control Ordinance, which prohibits the discharge of unauthorized pollutants into any storm drain system or receiving waters. The Project would implement Best Management Practices (BMPs) during construction to minimize runoff and erosion.

During Project operation, runoff from the Project Site would be conveyed to the storm drain system in accordance with City requirements. The Bureau of Engineering would review the drainage plans through the B-permit process (LAMC Section 62.105). The Project would construct connections, if necessary, to the existing stormwater system. The City would ensure that sufficient drainage capacity is available through building permit application review and approvals. The South Los Angeles and Southeast Los Angeles Community Plans EIR concludes that since only a small percentage of the land in the Community Plan Areas is vacant or undeveloped, any new development, whether more intense than existing conditions or not, would not result in a substantial increase of impervious surfaces contributing to runoff. The Project would not alter the existing drainage pattern such that there would be an increase in the rate or amount of surface runoff in a manner that would result in on- or off-site flooding. The Project would not contribute to runoff that would exceed the capacity of the stormwater system or provided substantial sources of polluted runoff.

[67] *Site Characterization Report, Wood, page 6.*

(b) Water Quality

Using the Appendix G questions regarding water quality, the Project would have a significant impact if the Project would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The Project Site is not located within a flood zone based on the City's Zimas and the South Los Angeles and Southeast Los Angeles Community Plans EIR.[68]

The Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) designates beneficial uses for surface water and groundwater, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Project Site is within the boundaries of the Basin Plan.

As indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, in addition to federal and state regulations, the City of Los Angeles has comprehensive standard requirements for development to ensure that violations of water quality standards do not occur. Groundwater at the Project Site vicinity is approximately 170 feet below ground surface. As indicated previously, Site excavation would occur for the remediation of lead-impacted soil to a depth of approximately nine feet. Excavation for the subterranean garage would require an additional six feet of excavation for a total of 15 feet.

The Project would comply with the City's grading permit regulations set forth in LAMC, Chapter IX, Article 1 and would prepare a WWECP if construction were to occur during the rainy season. BMPs for non-stormwater discharge management and materials management would be incorporated during construction to minimize pollutant loading. Throughout construction and operation, the project would implement BMPs to ensure that the runoff from the site would comply with applicable standards and requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would, therefore, require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous

[68] *City of Los Angeles, Zimas, accessed October 23, 2019 and South Los Angeles and Southeast Los Angeles Community Plans EIR, Figure 4.9-4.*

waste, would reduce the potential for the construction of the Project to release contaminants into groundwater.

The Project would comply with applicable federal and state regulations, as well as the City's standard requirements and the proper implementation of LID and BMPs to ensure that impacts to water quality would be less than significant. Therefore, the Project would not violate water quality or waste discharge requirements, and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures

The Certified EIR found impacts to be less than significant. As the Project Site is not located within a 100-year floodplain,no Mitigation Measure is applicable..

3.10.3 Any Substantial Changes in the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts with respect to hydrology and water quality.

3.10.4 Any New Information of Substantial Importance?

There is no new information of substantial importance which has become available relative to hydrology and water quality that would result in new or more severe significant environmental impacts.

3.10.5 Mitigation Measures Addressing Impacts

No mitigation measures are required as a result of the Project.

3.10.6 Conclusion

Based on the above, no new significant hydrologic/water quality impacts or a substantial increase in previously identified hydrologic/water quality impacts would occur as a result of the Project. Therefore, the impacts to hydrology and water quality as a result do not meet the standards for a subsequent or supplemental EIR pursuant to Public Resources Code, Section 21166 or CEQA Guidelines Section 15162.

3.11 Land Use and Planning

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	Less Than Significant	No	No	No	No
(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	No	No	No	No

3.11.1 Impact Determination in the EIR

Physically Divide an Established Community

Construction activities in the Plan Area could temporarily divide a community if roadways and sidewalks are temporarily blocked or partially blocked. However, these effects are temporary and do not rise to the level of significance.

The types of land uses proposed by the Plan would be compatible in character with the surrounding community. In addition, the Plan contains, as project features, unifying urban design standards, streetscape plans, and public benefits. Further, the Plan was found to not disrupt, divide, or isolate any existing neighborhoods or communities as it generally allows similar uses as those that currently exist although with a greater mix of uses and building intensity than currently exists. The result would be a vibrant neighborhood that focuses intensity on transit stations and provides services and amenities that support new and existing residential areas. The Plan would also not include new major infrastructure or roadways and, therefore, would not physically divide an existing established community or isolate an existing land use. Therefore, the Certified EIR determined that implementation of the Plan would result in a less than significant impact related to land use compatibility and physical division of an established community.

Mitigation Measures

Impacts related to land use and planning were determined to be less than significant. Therefore, no mitigation measures were required.

3.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Physically Divide an Established Community

The Certified EIR determined that implementation of the Plan would not include any extensions of roadways or other development features through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. Instead, the Certified EIR determined that the land use changes in the Plan would create consistency between the Community Plan land use map and the actual built land uses on parcels. The Project Site is currently vacant and is located in an established urbanized area of the City that is already served by a well-developed roadway system and utility infrastructure. The Project is an infill development within the confines of the existing Project Site boundaries with land uses similar to those already found in the immediate area. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site. Thus, the Project would not physically divide an established community and impacts would be less than significant.

Land Use Consistency

(1) SCAG 2016-2040 RTP/SCP

SCAG's 2016 RTP/SCS incorporates several policies that are applicable to the Project. **Table 1**, *Consistency of the Project with Applicable Goals of the 2016 – 2040 Regional Transportation Plan/Sustainable Communities Strategy*, provides a detailed analysis of the Project's consistency with applicable 2016 RTP/SCS policies in a side-by-side comparison.

TABLE 1
CONSISTENCY OF THE PROJECT WITH APPLICABLE GOALS OF THE 2016–2040 REGIONAL TRANSPORTATION PLAN/ SUSTAINABLE COMMUNITIES STRATEGY

Goal	Analysis of Project Consistency
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** The Project would contribute to the concentration of mixed-use infill development within an area with convenient access the light-rail Metro Expo Line Expo/Vermont stop (located 0.22-mile south of the Project Site) and several Metro bus lines. In addition, the project would provide a minimum of 40 bicycle parking spaces consistent with LAMC Section 12.21.A16(a)(2), including 20 short-term and 20 long-term spaces, thus facilitating bicycle use amongst visitors and employees. The Project's location and design would provide the visitors and employees with access to restaurant, retail, recreation, and entertainment activities within walking and biking distances and would provide convenient access to bus and rail services. The Project would comply with the 2016 CALGreen Code, Los Angeles Green Building Code (2017), Los Angeles Building Code (2017), and Planning and Zoning Code, subsequently reducing air quality impacts and increasing energy efficiency. The Project's location and design offers increased access to active transportation choices as well as access to transit. In addition, the Project would provide bicycle parking and is located in a walkable area thereby encouraging active transportation. Therefore, the Project would improve air quality.
Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** The Project would redevelop a site in a TPA located approximately 0.22 miles north of the Metro Expo Line Expo/Vermont stop and numerous regional Metro bus lines. In addition, the Project would introduce commercial uses in an area with pedestrian access to a large range of commercial and entertainment services as well as numerous job opportunities. In addition, the Project would provide up to 40 bicycle parking spaces. The Project would provide retail frontages and entrances on Vermont Avenue, which would active the street and provide easy access for residents and visitors more easily connect with the surrounding community. The Project would also provide pedestrian and bicycle access to the hotel lobby. Therefore, the Project would contribute to a land use and growth pattern that would facilitate the use of transit and active transportation options.

Goal	Analysis of Project Consistency

SOURCE: ESA, 2019.

Based on the analysis presented in Table 1 the Project would be consistent with and would not obstruct implementation of the 2016 RTP/SCS. The Project would be located near Exposition Boulevard, which is approximately three blocks (0.22-miles) to the south of the Project Site. The Metro Expo Line runs along Exposition Boulevard with a stop at Expo/Vermont, and the following connections: Metro Local 102 and 207, Metro Rapid 754, and Metro Express 550. Other bus lines within the vicinity of the Project, include Metro Local 38 along W Jefferson Boulevard; Metro Local 37 along West Adams Boulevard; and Metro Local 102 along Exposition Boulevard. Furthermore, the Project would provide a mixed-use commercial development, which includes a 168-room hotel and approximately 4,500 square feet of ground floor retail space, in a mixed-use area facilitating land use patterns that link land use and sustainable transportation options. Because the Project would be consistent with applicable goals of SCAG's 2016 RTP/SCS, which was adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to SCAG's 2016 RTP/SCS would be less than significant.

(2) City of Los Angeles General Plan Framework Element

The City of Los Angeles' *General Plan Framework* provides a comprehensive, long range document containing purposes, policies and programs for the development of the City of Los Angeles.[69] As indicated above, the Project Site is located in the South Los Angeles Community Plan Area. Incorporated as part of the Land Use Element, the South Los Angeles Community Plan designates the Project Site as Community Commercial. The intent of the Community Commercial land use designation is to provide a variety of retail establishments, services and amenities for residents, employees and visitors of the surrounding area.[70] Further, commercial areas are grouped into four general categories, Neighborhood Districts, Community Centers, Regional Centers, and Mixed-Use Boulevards. The areas around Vermont Avenue and Exposition Boulevard are identified in the South Los Angles Community Plan as Community Center, which contain uses that serve the larger community, such as hotels or motels, small offices, cultural and entertainment facilities, and schools and libraries. A portion of Vermont Avenue between Jefferson Boulevard and Martin Luther King Jr. Boulevard, including the Project Site, is designated as a Mixed Use Boulevard in the General Plan Framework. Mixed Use Boulevards connect the City's neighborhood districts and community, regional, and Downtown centers.

The Project, which is located at 3685 Vermont Avenue approximately 0.22-miles north of Exposition Boulevard, would result in the redevelopment of the property with a mixed-used commercial development, including a 168-room hotel and approximately 4,500 square feet of

[69] *City of Los Angeles, 2001b. The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, Re-adopted August 8, 2001. https://planning.lacity.org/Framework.html, Accessed Aug 5, 2019.*

[70] *City of Los Angeles, 2017. South Los Angeles County Community Plan, Adopted November 22, 2017.*

ground floor retail space. These uses would be consistent with the General Plan land use designation and commercial area category.

The Project Site is zoned C2-2D (CPIO), and development on the Project Site is regulated by the CPIO District. As detailed in the City's municipal code, the "C2" Commercial Zone includes uses such as, retail, theaters, hotels, broadcasting studios, parking, buildings, parks and playgrounds, retail w/ limited manufacturing, service stations and garages, churches, schools, auto sales, and other uses. In addition, the Site is located in a Methane Buffer Zone, which is an area identified by the City in which there is a risk of methane intrusion emanating from geologic formations. As indicated above, methane testing was completed at the Project Site and concludes that no methane mitigation would be required for the Project.[71]

The City of Los Angeles adopted the Mobility Plan 2035: An Element of General Plan in September 2016, which sets forth goals and policies to improve overall transportation in the City. The Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context. The City's Transportation Assessment Guidelines ("Guidelines") have been developed to effectuate a review process that advances the City's vision of developing a safe, accessible, well-maintained, and well-connected multimodal transportation network. The Guidelines have been developed to identify land use development and transportation projects that may impact the transportation system; to ensure proposed land use development projects achieve site access design requirements and on-site circulation best practices; to define whether off-site improvements are needed; and to provide step-by-step guidance for assessing impacts and preparing Transportation Assessment Studies.

The Guidelines, which are implemented by the City of Los Angeles Department of Transportation (LADOT), establishes the criteria for projects which will require a transportation assessment, including development projects estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a development project is required; transportation projects likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required; or if required by ordinance or regulation. The Guidelines also detail the process for preparing a transportation assessment with consideration for both CEQA transportation impacts and non-CEQA transportation analysis.

The Proposed Project's trip generating uses would consist of 168-hotel rooms room hotel with a 4,519 square foot lobby/lounge space, 4,427 square feet of ground floor retail space, 1,527 square feet of meeting space, and 1,330 square feet of recreation areas, and expected to generate 1,255 daily trips. Thus, in accordance with the City's Guidelines, a Transportation Impact Study (TIS) has been prepared for the Proposed Project, and is included as Appendix A. As stated

[71] *EFI Global, letter report, July 26, 2019.*

in the TIS, transportation impacts associated with the Proposed Project are considered less than significant pursuant to CEQA. The Project Site is also located in a Transit Priority Area (TPA), as defined by Public Resources Code Section 21099, and is designated Subarea G-TOD High in the South Los Angeles Community Plan Implementation Overlay District (South LA CPIO District).[72] Areas designated Subarea G- TOD High are located in close proximity to Metro light rail stations, and offer greater incentives for projects that include affordable housing. The Proposed Project does not include housing, and would not be eligible for incentives offered for projects within Subarea G- TOD High.

Table 2, *Comparison of the Project to Applicable Policies of the General Plan Framework*, provides a consistency analysis of the Project with applicable objectives and policies of the General Plan Framework. As discussed in Table 2, the Project would be consistent with applicable objectives and policies of the General Plan Framework. Because the Project would be consistent with applicable policies of the General Plan Framework, which was adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the General Plan Framework would be less than significant.

TABLE 2
COMPARISON OF THE PROJECT TO APPLICABLE POLICIES OF THE GENERAL PLAN FRAMEWORK ELEMENT

Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Framework Element Land Use Diagram designates districts, centers and mixed-use boulevards that are encouraged to develop with appropriate uses and character for their land use designations. The Project Site is identified as Community Commercial on the General Plan Framework's Land Use Diagram. The proposed project is a mixed-use commercial development consisting of hotel rooms and retail floor area that would be consistent with the existing land use designation.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**Consistent.** The Project would provide a mixed-use commercial development that is in proximity to other commercial, retail, entertainment, and restaurant uses, as well as existing transit services, such as the Metro Expo Line, which is located approximately 0.22-miles south of the Project Site. The provision of a hotel and other neighborhood-serving commercial uses provided within proximity to transit services would support residents, visitors and tourism, and would also provide job opportunities for existing and future residents in the Project area.

[72] *City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed May 10, 2019.*

Objective/Policy	Analysis of Project Consistency
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram[73] (Figures 3-1 to 3-4) and Tables 3-1[74]. (P1, P2, P18)	**Consistent.** According to Table 3-1, Land Use Standards and Typical Development Characteristics, the Community Center designation supports retail commercial, food stores, eating and drinking establishments, and commercial overnight accommodations. The Project Site is zoned Community Commercial (C2-2D CPIO), which allows for the development of hotels, restaurants, and cafes. The Project would provide 168 hotel rooms and approximately 4,500 square feet of ground floor commercial space (ZIMAS, 2019). Table III-2 of the South Los Angeles CPIO District indicates that projects in Subarea G (TOD High) must be a minimum of two stories and no more than seven stories (105 feet) with a maximum 1.5:1 FAR. Mixed-use projects, such as the Project, are allowed a maximum FAR of 4:1, if approved. The Project would be 7 stories in height (75 feet) and would have a FAR of 3:1.
Objective 3.2: 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.	**Consistent.** The Project would contribute to the concentration of mixed-use infill development within a TPA and within convenient access to the Metro Expo Line (located 0.22 miles from the Project Site) and Metro bus lines. The Project would provide up to 40 bicycle parking spaces. The location and design would provide the Project's visitors and employees with access to restaurant, retail, recreation, and entertainment activities within walking and biking distances and would provide convenient access to bus and rail services. In addition, the Project would be designed to comply with applicable requirements of the 2016 CALGreen Code, Los Angeles Green Building Code (2017), Los Angeles Building Code (2017), and Planning and Zoning Code, subsequently reducing air quality impacts and increasing energy efficiency. The Project's location and design offers increased access to active transportation choices and access to services that would improve the quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and reduced air pollution.
Policy 3.2.1: Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Project would introduce a high density, mixed-use commercial building that would be compatible within this area designated as a TPA. The Project would be located within an area that is identified for high density growth on the General Plan Framework's Land Use Diagram and the area has been evolving into an increasingly mixed-use area. The Project would include a 168 room hotel with a 4,519 square foot lobby/lounge space, 4,427 square feet of ground floor retail space, 1,527 square feet of meeting space, and 1,330 square feet of recreation uses (a fitness center). The Project would provide higher density development and a broader range of uses on a currently underutilized parcel contributing to a more concentrated, transit-oriented center and providing additional retail opportunities for nearby residents, employees, and visitors to the Project Site.

[73] *Land use designations are generalized on the Long-Range Land Use Diagram. The basic locations (e.g., along arterial frontages and generally within one-quarter mile of transit stations) and interrelationships among uses and density are depicted. The precise (parcel) boundaries are to be determined in the community plans.*

[74] *Permitted uses and densities will be specified for each land use category by a zoning system to be subsequently prepared and implemented through re-zonings to reflect amendments to the community plans.*

Objective/Policy	Analysis of Project Consistency
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project is designed to promote pedestrian access by activating the streetscape and providing additional retail opportunities for nearby residents, employees, and visitors to the Project Site. Pedestrian access to the Project Site would be provided via sidewalks along the perimeter of the Project Site. The Project is designed so that pedestrians can access retail uses from the sidewalk. Consistent with the LAMC, the Project would also would provide at least 40 bicycle parking spaces in dedicated areas on the Project Site, which would facilitate bicycle use. Bicyclists would have the same access opportunities to the Project Site as pedestrians.
Policy 3.2.4: 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.	**Consistent.** As described above, the Project Site is located in an urbanized area that is developed with a mix of uses. Surrounding uses include residential uses, commercial uses, and institutional uses, such as USC and an adjacent church. Uses on the west side of Vermont Avenue are mixed while further to the west of Vermont Avenue are primarily residential uses. The western edge of the USC campus is located along the eastern side of Vermont Avenue. The Project would be consistent with the on-going mixed-use redevelopment in the area and targeted growth policies applicable to TPAs and would be sited and designed to enhance the character of the South LA CPIO District. As discussed above, Mixed Use Boulevards are intended to connect the City's different centers, thereby creating a cohesive and compatible scale and character. The proposed 7-story mixed-use building would be compatible in scale with the existing surrounding buildings that typically range from one to five stories. The Project would be compatible in use and scale of the surrounding area, contributing to the economic livelihood and character of the area.
Objective 3.4: 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.	**Consistent.** The Project would provide new hotel and retail uses within a TPA. The Project would be consistent with the on-going redevelopment of this area and TPA by providing increased intensity and mixed-use growth. Therefore, the Project would provide for increased intensity and mixed-use growth in a TPA while conserving existing neighborhoods and districts by not creating conflicts with surrounding land uses and by enhancing the urban character of the existing district as further described in the analysis of Policy 3.2.4 above
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram	**Consistent.** The Project would provide new hotel and retail uses within a TPA. The Project would be consistent with the on-going redevelopment of this area and TPA by providing increased intensity and mixed-use growth. Therefore, the Project would provide for increased intensity and mixed-use growth in a TPA while conserving existing neighborhoods and districts by not creating conflicts with surrounding land uses and by enhancing the urban character of the existing district as further described in the analysis of Policy 3.2.4 above.
Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.	**Consistent.** The Project would develop a 168-room hotel and ground-floor commercial space within an area designated as Community Center. The area surrounding the Project Site contains a variety of land uses, including residential, commercial, and institutional uses. The Project would be located in a mixed-use area. With the provision of ground floor commercial uses, the Project would provide residents in the area with additional commercial and employment opportunities, thereby contributing to the provision of services within the neighborhood. The provision of ground floor commercial uses and an enhanced streetscape, the Project would promote neighborhood and community activity. Developing the Project Site would enhance the current area, making it a more desirable place to live, work, and visit.

Objective/Policy	Analysis of Project Consistency
Policy 3.9.1: Accommodate the development of community-serving commercial uses and services and residential dwelling units in areas designated as "Community Center" in accordance with Tables 3-1 and 3-5. The ranges and densities/intensities of uses permitted in any area shall be identified in the community plans.	**Consistent.** The Project Site is designated as Community Commercial. The Project would provide community-serving commercial uses, including a hotel and ground-floor commercial uses. Table 3-1 of the General Plan Framework Element identifies retail uses, neighborhood-serving uses, and overnight commercial accommodations as typical uses within areas designated as Community Center. Table 3-5 of the General Plan Framework Element lists the Community Center designation and its corresponding zones, including CR, C4, and [Q]C2. The Project Site is zoned C2-2D (CPIO). As such, the Project would accommodate the development of community-serving commercial uses and services in an area designated as Community Center.
Policy 3.9.6: Require that commercial and mixed-use buildings located adjacent to residential zones be designed and limited in height and scale to provide a transition with these uses, where appropriate.	**Consistent.** The Project would be designed and constructed to fully comply with all applicable zoning standards, ensuring that the character, scale, and intensity of the development would be consistent with surrounding uses. The Project is sited and designed to provide adequate transitions and buffers between higher density development and lower scale development adjacent to the Project Site as further described in the analysis of Objective 3.2.4 above.
Policy 3.9.7: Provide for the development of public streetscape improvements, where appropriate.	**Consistent.** The seven existing street trees would remain and would be protected during Project construction.
Policy 3.9.8: Support the development of public and private recreation and small parks by incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	**Consistent.** The Project would provide an on-site fitness center and would provide two exterior terraces, providing private recreation space for patrons of the Project. The inclusion of ground floor commercial space and enhancement of the streetscape would activate the street, revitalizing a currently vacant parcel. The Project would enhance the experience of both nearby residents and tourists, thereby contributing to the neighborhood.
Policy 3.9.9: Require that outdoor areas of developments, parks, and plazas located in community centers be lighted for night use, safety, and comfort commensurate with their intended nighttime use, where appropriate.	**Consistent.** The Project would provide exterior lighting for safety. All lighting would be adequately shielded and would not spillover into adjacent uses**.**
Economic Development	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The Project would provide a 168-room hotel with associated amenities and 4,427 square feet of ground floor retail space. The provision of a hotel and neighborhood-serving commercial uses provided alongside well established transit services would support the needs of local residents and visitors, would support local tourism, thereby sustaining economic growth. The Project would be designed and operated to comply with applicable requirements of the 2016 CALGreen Code, Los Angeles Green Building Code (2017), Los Angeles Building Code (2017), and Planning and Zoning Code, and all other applicable regulations that assure maximum feasible environmental quality.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**Consistent.** The Project would contribute to the concentration of mixed-use infill development within a TPA and within convenient access to the Metro Expo Line (located 0.22 miles from the Project Site) and Metro bus lines.

Objective/Policy	Analysis of Project Consistency
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	**Consistent.** The Project would contribute to the concentration of mixed-use infill development within a TPA and within convenient access to the Metro Expo Line (located 0.22 miles from the Project Site) and Metro bus lines. The Metro Expo Line runs along Exposition Boulevard with a stop at Expo/Vermont, and the following connections Metro Local 102 and 207, Metro Rapid 754, and Metro Express 550. Other bus lines within the vicinity of the Project, include Metro Local 38 along West Jefferson Boulevard; Metro Local 37 along West Adams Boulevard; and Metro Local 102 along Exposition Boulevard.[75] Therefore, the Project would provide commercial development within proximity to transit.

SOURCE: ESA, 2019.

(3) South Los Angeles Community Plan

Table 3, *Comparison of the Project to Provisions of the South Los Angeles Community Plan*, evaluates the consistency of the Project with objectives of the *South Los Angeles Community Plan*. As shown in Table 3, the Project would be consistent with the land use objectives for the Community Commercial designation. The intent of the Community Commercial land use designation is to provide a variety of retail establishments, services and amenities for residents, employees and visitors of the surrounding area. As stated above, Neighborhood Districts, Community Centers, Regional Centers, and Mixed-Use Boulevards. The areas around Vermont Avenue and Exposition Boulevard are identified in the South Los Angles Community Plan as Community Center. The area contains uses that serve the larger community, such as hotels or motels, small offices, cultural and entertainment facilities, and schools and libraries. The Project would be consistent with the Plan's objectives related to providing commercial uses in appropriate locations; providing higher density development and a mix of uses in areas designated community commercial; and providing retail establishments, services and amenities for residents, employees and visitors of the surrounding area. Because the Project would be consistent with applicable policies of the *South Los Angeles Community Plan*, which was adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to *South Los Angeles Community Plan* would be less than significant.

[75] *Metro, 2019. Metro Expo Line Route Map, June 22, 2019. https://media.metro.net/documents/ab0e991c-13e2-47ad-99ee-470f88e49255.pdf. Accessed Aug 5, 2019.*

TABLE 3
COMPARISON OF THE PROJECT TO PROVISIONS OF THE SOUTH LOS ANGELES COMMUNITY PLAN

Plan Objectives	Analysis of Project Consistency
Community Commercial Land Use	
Policy LU12.1 Density and Mixed-Use. Locate higher densities and a mix of uses in areas designated community commercial, as appropriate, unless identified as commercial-only.	**Consistent.** The Project would provide a mixed-use commercial development within the South Los Angeles Community Plan Area, which would provide employment opportunities, and would provide services for the existing population near regional destinations, such as USC, within close proximity to transit opportunities. The Project would enhance the urban and economic character of the area, with an emphasis on the provision of neighborhood-serving ground floor commercial uses. The provision of neighborhood serving retail along with a hotel would provide a greater mix of uses in the area.
Policy LU12.2 Design for Transitions. The scale and massing of new development along corridors should provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods with lower development intensities and building heights.	**Consistent.** The Project would provide a hotel with ground floor commercial space, which would activate the street frontage on a parcel that is currently underutilized. This development would comply with all applicable zoning standards, ensuring that the character, scale, and intensity of the development would be consistent with surrounding uses.
Policy LU12.3 Design Standards and Guidelines. Recommend that new development projects conform to design standards and guidelines that promote high-quality and attractive buildings, as well as an active pedestrian oriented environment.	**Consistent.** The Project would provide ground floor retail space, which would activate the street frontage on a parcel that is currently vacant. The Project would comply with all applicable zoning standards, ensuring that the character, scale, and intensity of the development would be consistent with surrounding uses.
Policy LU12.5 Limit Incompatible and Overconcentrated Uses. Maintain the community feel of community commercial areas by limiting uses that impact the built environment, are over-concentrated, and contain incompatible operations that spill over into the residential neighborhoods.	**Consistent.** FAR is a measure of intensity and contributes to community feel. The Project would have a FAR of 3.0:1, below the maximum FAR of 4.:1 allowed for mixed-use projects within Subarea G (TOD High) of the South Los Angeles CPIO District. As indicated above, the Project Site is located in an area that is designated as a Mixed Use Boulevard. The Project would be compatible with the surrounding mixed-use area and would not result in incompatible operations or significant environmental impacts. In addition, the Project would provide all necessary infrastructure improvements to meet Project-related demands. As analyzed under Criterion (e) below, the Project's impacts to public services and utilities would be less than significant. Public services and utilities in the Project vicinity are provided by a number of utility and service providers. These providers offer short- and long-term planning for the provision of services based on data from numerous sources, and provide new facilities as appropriate. Furthermore, the agencies individually monitor supply and demand and update their infrastructure accordingly. In addition, the hotel would include a private fitness center and two outside terraces to meet the needs of on-site visitors.
Bicycling	
Policy M4.3 Bicycle Amenities. Incorporate bicycle amenities (such as parking, lockers, changing rooms and showers) in public facilities, parks, commercial and multi-family residential developments, employment and transit centers, as well as park-and-ride facilities.	**Consistent.** The proposed project would provide a minimum of 40 bicycle parking spaces consistent with LAMC Section 12.21.A16(a)(2), including 20 short-term and 20 long-term spaces, thus facilitating bicycle use by visitors and employees.

SOURCE: ESA, 2019.

Mitigation Measures

None required.

3.11.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant land use impacts beyond those already identified in the Certified EIR.

3.11.4 Any New Information of Substantial Importance?

There is no new information of substantial importance which has become available relative to land use that would result in new or more severe significant environmental impacts.

3.11.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on land use, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.11.6 Conclusion

Based on the above, no new significant land use impacts or a substantial increase in previously identified land use impacts would occur as a result of the Project. Therefore, the impacts to land use as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.12 Mineral Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
MINERAL RESOURCES: Would the project:					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

3.12.1 Impact Determination in the EIR

The Certified EIR stated that the Plan is not located in an area designated for mineral resources. Therefore, implementation of the Plan would not result in the disruption or loss of mineral resources.

Mitigation Measures

No impacts related to mineral resources were determined for the Plan and no mitigation measures were required.

3.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project would be located within the SLA Community Plan Area, which as stated in the Certified EIR, is not located in an area designated for mineral resources. The Project Site is currently zoned C2-2D-CPIO, and the Project does not propose any changes to the zoning or to the existing Community Commercial land use designation. Thus, the Project Site is not zoned for oil extraction and drilling, or mining of mineral resources, and there are no such sites at the Project Site. As such, the Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Mitigation Measures

None required.

3.12.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts with respect to mineral resources beyond those already identified in the Certified EIR.

3.12.4 Any New Information of Substantial Importance?

There is no new information of substantial importance which has become available relative to mineral resources that would result in new or more severe significant environmental impacts.

3.12.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have no impact on mineral resources, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.12.6 Conclusion

Based on the above, no new significant mineral resources or a substantial increase in previously identified mineral resources would occur as a result of the Project. Therefore, the impacts to mineral resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.13 Noise

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
NOISE: 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?	Significant and Unavoidable	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Significant and Unavoidable	No	No	No	Yes
(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	No	No	No	No

This section is based on the Certified EIR and the following item, which is included as **Appendix A** to this technical memorandum:

Noise and Vibration Technical Report, ESA, October 2019.

3.13.1 Impact Determination in the EIR

Depending on the location of construction activities, typical construction noise levels could exceed 75 dBA despite implementation of mitigation measures. Implementation of environmental review on a discretionary project level would help to reduce this impact, but not necessarily to less than significant, because certain construction activities may still be required in proximity to nearby sensitive receptors, and construction-related noise levels could exceed the 75 dBA threshold. Construction activity would be shortterm and temporary at each location, although construction is anticipated to be ongoing somewhere in the area throughout the time frame of the Proposed Plans. Regardless, impacts related to the generation of construction noise in excess of the LAMC standards under the Proposed Plans would be significant and unavoidable. Implementation of Mitigation Measure N2 will be incorporated into the environmental standards for projects in the

non-residential CPIO subareas. Implementation of these common industry standard mitigation measures is expected to reduce potential operational noise impacts from industrial and commercial operations to less than significant.

In regards to construction vibration, the EIR concluded that It is anticipated that Mitigation Measure N3 would substantially reduce/control construction vibration for historically designated or national, state or local eligible structures. In addition, Mitigation Measure N4 would limit vibration levels at uses other than historic properties. However, in the absence of construction details associated with specific projects and without knowing the proximity of construction activities to specific receptors, it is anticipated that construction vibration levels at adjacent buildings could exceed the thresholds of significance. Therefore, the Proposed Plans would result in a significant and unavoidable impact related to construction vibration.

In regards to Operational Noise Impacts, the EIR concluded that Implementation of Mitigation Measure N2 includes mitigation measures beyond the CPIO development standards. While difficult to quantify noise reduction associated with Mitigation Measure N2, implementing these conditions would reduce noise levels. Foreseeable projects would be consistent with the LAMC, the CPIO development standards, and include additional mitigation measures to control noise exposure. After implementation of mitigation, future noise levels would be consistent with Table 4.12-3, and would not increase noise levels at adjacent receptors by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories, or increase any ambient noise level by 5 dBA or more. Implementation of mitigation measures would reduce potential operational noise impacts to less than significant.

Impacts related to temporary and periodic noise from construction activity were determined to be significant without mitigation. While difficult to quantify, the noise reduction associated with each part of Mitigation Measure N1 would noticeably reduce noise levels. For example, requiring equipment mufflers would reduce engine noise by at least 3 dBA. However, in the absence of detailed noise analyses associated with specific projects, it is anticipated that construction noise levels at various sensitive land uses would exceed the City's thresholds of significance. Therefore, the Proposed Plans would result in a significant and unavoidable impact related to temporary and periodic noise after mitigation.

Finally, the EIR concluded no impacts related to excessive noise levels within the vicinity of a private airstrip would occur.

Mitigation Measures

The following mitigation measures were provided in the Certified EIR to reduce impacts related to noise and vibration:

N1 Any approval of a project located within a CPIO Subarea (except for Residential Subareas M, N, and O) shall ensure that all contractors include the following best management practices in contract specifications, where applicable: • Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives

are available, truck traffic shall be routed on streets with the fewest residences. • The construction contractor shall locate construction staging areas away from sensitive uses. • When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses. • Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving. • Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

N2 The following conditions shall apply to future development within the CPIO Subareas (except Residential Subareas M, N, and O): • Industrial activity yards that include the operation of heavy equipment shall be shielded by sound barriers that block line-of-sight to sensitive receptors. • Mechanical equipment (e.g., heating, ventilation and air conditioning (HVAC) Systems) shall be enclosed with sound buffering materials. • Truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m. when located within 200 feet of a residential land use. • Parking structures located within 200 feet of any residential use shall be constructed with a solid wall abutting the residences and utilize textured surfaces on garage floors and ramps to minimize tire squeal.

3.13.2 Do Proposed Changes Involve New Significant Impacts?

The following review of potential noise impacts resulting from the Project is based on the Noise and Vibration Technical Report, prepared by Environmental Science Associates (ESA) (included as Appendix A to this memorandum).

In accordance with the State CEQA Guidelines Appendix G, a project would have a potentially significant impact related to noise and groundborne vibration if it would 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?

b) Generation of excessive groundborne vibration or groundborne noise levels?

c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise?

In assessing the Project's potential impacts related to noise and groundborne vibration and noise in this section, the City has determined to use Appendix G of the State CEQA Guidelines as its thresholds of significance. The factors below from the City's Noise Ordinance and the Federal Transit Administration (FTA) groundborne vibration and noise criteria for assessing potential

impacts relating to building damage and human annoyance will be used where applicable and relevant to assist in analyzing the Appendix G questions.

The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public land use airport. The airports nearest to the Project Site are the Los Angeles International Airport at approximately 8 miles to the southwest and Santa Monica Airport at approximately 9 miles to the west. The Project would not expose people residing or working in the Project Site area to excessive noise levels for a project within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public land use airport, and no impact would occur with respect to Threshold "c." No further analysis is required for Threshold "c" of Appendix G.

(i) Ambient Noise Levels at Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to noise than others due to the types of activities typically involved at the receptor locations and the effect that noise can have on those activities and the persons engaged in them. The Thresholds Guide states that residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses.[76]

Ambient noise measurements were taken at five locations, representing the nearby land uses in the vicinity of the Project Site to establish ambient noise levels. The ambient noise measurements were conducted using a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately five feet above the local grade, at the following locations:

- Measurement Location R1: This measurement location represents the existing noise environment of the off-site church use immediately to the north of the Project Site. The sound level meter was placed at the Project Site property line on the northern boundary of the Project Site.
- Measurement Location R2: This measurement location represents the existing noise environment at the multi-family residential uses to the north-northwest of the Project Site along W. 36th Place, approximately 30 feet from the Project Site boundary. The sound level meter was placed on the south side of W. 36th Place to the north-northwest of the Project Site.
- Measurement Location R3: This measurement location represents the existing noise environment at the residential uses immediately to the west of the Project Site along W. 37th Street. The sound level meter was placed on the southwestern boundary of the Project Site.
- Measurement Location R4: This measurement location represents the existing noise environment of the residential uses to the south of the Project Site along W. 37th Street, approximately 70 feet from the Project Site boundary. The sound level meter was placed on the south side of W. 37th Street to the south of the Project Site.
- Measurement Location R5: This measurement location represents the existing noise environment of the western side of the University of Southern California campus, specifically

[76] *City of Los Angeles, LA CEQA Thresholds Guide, 2006. pages I.1-3.*

the Denney Research Center and the Scene Dock Theater, approximately 120 feet and 160 feet, respectively, from the Project Site boundary. The sound level meter was placed on the east side of Vermont Avenue to the east of the Project Site in the vicinity of the Denney Research Center and the Scene Dock Theater.

All other noise-sensitive uses of the type listed in the Thresholds Guide are located at greater distances from the Project Site (more than 500 feet) and would experience lower noise levels from potential sources of noise on the Project Site. Therefore, noise levels at additional sensitive receptors beyond those identified above were not evaluated.

A summary of the noise measurement data is provided in **Table 6,** *Summary of Ambient Noise Measurements*. The measured daytime noise levels ranged from 57.5 to 70.8 dBA L_{eq}.

TABLE 6
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Location, Duration, Existing Land Uses and, Date of Measurements	Measured Ambient Noise Levels (dBA)[a] Daytime (7 A.M. to 10 P.M.) Hourly L_{eq}
R1 – Church uses to the north 8/29/19 (2:29 P.M. to 2:44 P.M.)/Thursday	68.4
R2 – Residential uses to the north/northwest 8/29/19 (2:46 P.M. to 3:01 P.M.)/Thursday	61.8
R3 – Residential uses to the west 8/29/19 (2:12 P.M. to 2:27 P.M.)/Thursday	57.5
R4 – Residential uses to the south 8/29/19 (1:56 P.M. to 2:11 P.M.)/Thursday	58.3
R5 – Research Office and Theater uses to the east 8/29/19 (3:04 P.M. to 3:19 P.M.)/Thursday	70.8

[a] Measured noise output files are provided in **Exhibit A**.
SOURCE: ESA, 2019.

(ii) Noise Levels

(a) Construction

The City of Los Angeles has established requirements for preparing a noise analysis for a Class 32 Categorical Exemption under CEQA.[77] The requirements state that LAMC Chapter XI, Article 2, Section 112.05 on construction noise may be used to demonstrate that the project will not result in a significant impact. Under this standard, the applicant must at minimum demonstrate compliance with LAMC Section 112.05. Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone.

On-site construction noise impacts were projected by determining the noise levels expected to be generated by the different types of construction activities anticipated, and calculating the

[77] *City of Los Angeles, Findings / Specialized Requirements: Class 32 Categorical Exemption, November 10, 2016.*

construction-related noise levels produced by the construction equipment assumed at sensitive receptors. More, specifically, the following steps were undertaken to assess construction-period noise impacts.

- Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data;
- For each type of construction equipment expected to be used during each phase of construction, based on information provided by Project Applicant, typical noise levels were obtained from the Federal Highway Administration (FHWA) roadway construction noise model (RCNM);
- The construction noise levels were then calculated for each construction phase using the FHWA RCNM, conservatively, in terms of hourly L_{eq} based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance, assuming that all of the equipment for each construction phase would be in use concurrently. Since it is not physically possible for equipment to be all located at the same location at the same time, the loudest equipment was assumed to be located at 50 feet while other equipment were located at staggered distances of 100 feet and 150 feet.
- Construction noise levels, with incorporation of noise-reducing Project Design Features (i.e., an estimated 10 dBA reduction from the use of noise barriers), were then compared to the construction noise significance thresholds identified above.

Roadway noise levels were projected using the FHWA's Traffic Noise Model (TNM) methodology[78] and the estimated number for construction trucks and construction workers during Project construction. This method allows for the definition of roadway configurations, barrier information (if any), and receiver locations. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions. For construction, Project-related noise along the potential haul route was analyzed.

(b) Operation

The following criteria are applied to the Project, as set forth in the City's Noise Regulations, to evaluate operational noise. The Project would have a significant impact from operations if:

- The Project causes the ambient noise levels measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" categories; or
- The Project causes the ambient noise levels measured at the property line of affected uses to increase by 5 dBA CNEL or more increase in noise level; or
- Project-related operational on-site (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment, outdoor activities, or parking facilities increase the ambient noise level (L_{eq}) at noise sensitive uses by 5 dBA L_{eq}.

[78] *The noise prediction model which was developed based on calculation methodologies described in FHWA Traffic Noise Model Technical Manual (1998) and validated with the results from FHWA Traffic Noise Model Version 2.5.*

Roadway noise levels were projected using the FHWA's TNM methodology[79] and the roadway traffic volume provided in the Project's Traffic Study prepared by Gibson Transportation Consulting, Inc.[80] Roadway noise attributable to Project operations was calculated in terms of CNEL on the analyzed roadway segments and compared to baseline noise levels that would occur under the "without Project" condition.

Stationary point-source noise levels at the Project Site were evaluated by first identifying the noise levels generated by the Project's open space areas, outdoor stationary noise sources such as rooftop mechanical equipment, parking structure automobile operations, and loading/refuse collection area activity, then calculating the hourly L_{eq} noise level from each noise source at sensitive receptor property lines, and then comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate the stationary point-source noise impacts:

- Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data;
- Typical noise levels generated by each type of stationary point-source noise generator, including mechanical equipment, open spaces, loading dock, and parking structure operations, were obtained from measured noise levels for similar equipment/activities, noise levels published in environmental noise assessment documents for land use development projects or scientific journals, or noise levels from equipment manufacturer specifications;
- Distances between stationary point-source noise generators and surrounding sensitive receptor locations were measured using Project architectural drawings, Google Earth, and site plans;
- Stationary point-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;
- Parking-related noise levels were estimated by using the methodology recommended by the FTA for the general assessment of stationary transit noise sources. Using this methodology, the peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking garage:[81]

  $L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6$, where:

  - $L_{eq}(h)$ = hourly L_{eq} noise level at 50 feet;
  - SEL_{ref} = 92 dBA at 50 feet, reference noise level for 1,000 cars in peak activity hour at the center of a parking garage;
  - NA = actual number of automobiles per hour.

[79] *The noise prediction model which was developed based on calculation methodologies described in FHWA Traffic Noise Model Technical Manual (1998) and validated with the results from FHWA Traffic Noise Model Version 2.5.*

[80] *Gibson Transportation Consulting, Inc., Draft Transportation Impact Study for the 3685 S. Vermont Avenue Hotel Project, Los Angeles, CA, 2019.*

[81] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 4-13 and Table 4-14, pages 45 and 47, 2018.*

- Noise level increases, if any, were compared to the stationary point-source noise significance thresholds identified above; and
- For outdoor mechanical equipment, it was assumed that the Project would comply with the requirements of LAMC Section 112.02 to ensure that the maximum noise generated by any and all outdoor mechanical equipment would not exceed the ambient noise level by more than 5 dBA, which falls within the significance threshold identified above.

The combined noise levels from all operational noise sources were estimated by logarithmically adding together the noise levels from all of the operational noise sources at the maximally impacted noise-sensitive receptor locations, assuming the simultaneous contribution of noise from each source. As discussed previously, the dBA scale is based on logarithms, where a doubling of sound energy corresponds to a 3 dBA increase (e.g., if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA). The composite noise sources include off-site roadway noise and on-site noise sources. Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls and is thus addressed within the evaluation of groundborne vibration as discussed in the next subsection below.

(iii) Groundborne Vibration and Groundborne Noise

The City has not adopted criteria to assess vibration impacts during construction. Thus, for this Project, the City has determined to use the FTA's criteria for structural damage and human annoyance, as described below, to evaluate potential impacts related to Project construction and operation.

- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.5-in/sec PPV at the nearest off-site buildings or structures of Building Category I, Reinforced-concrete, steel, or timber (no plaster).
- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.3-in/sec PPV at the nearest off-site buildings of Building Category II, Engineered concrete and masonry (no plaster).
- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.2-in/sec PPV at the nearest off-site buildings of Building Category III, Non-engineered timber and masonry buildings.
- Potential Building Damage – Project construction activities that cause groundborne vibration levels to exceed the potential structural damage threshold of 0.12-in/sec PPV at the nearest off-site buildings of Building Category IV, Buildings extremely susceptible to building damage.

Based on FTA guidelines, construction and operational vibration impacts associated with human annoyance would be significant if the following were to occur:

- Project construction and operational activities cause ground-borne vibration levels to exceed the following at off-site residential uses:
  - 72 VdB for frequent events (more than 70 events per day);
  - 75 VdB for occasional events (30 to 70 events per day); or

  - 80 VdB for infrequent events (fewer than 30 events per day).
- Project construction and operational activities cause ground-borne vibration levels to exceed the following at off-site institutional uses with primarily daytime use:
  - 75 VdB for frequent events (more than 70 events per day);
  - 78 VdB for occasional events (30 to 70 events per day); or
  - 83 VdB for infrequent events (fewer than 30 events per day).

Groundborne vibration and noise impacts were evaluated for potential building damage and human annoyance impacts by identifying the Project's potential vibration sources, estimating the maximum groundborne vibration and noise levels at the distances between the Project's vibration sources and the nearest structure and groundborne vibration annoyance receptor locations using vibration data from the FTA manual, and making a significance determination based on the significance thresholds described above.

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?

(iv) Construction

(a) On-Site Construction Noise

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operating concurrently. The estimated noise levels at the off-site sensitive receptor locations were calculated using the FHWA's RCNM, and were based on a maximum concurrent operation of equipment, which is considered to be a worst-case evaluation because Project construction would typically use less overall equipment on a daily basis, and as such would generate lower noise levels.

Table 7, *Estimated Maximum Construction Equipment Noise Levels,* shows the estimated construction noise levels expected to occur at the nearest off-site sensitive uses during a peak day of construction activity at the Project Site. Construction activity may occur on the Project Site close to the Project Site boundary. Since construction equipment are mobile and are typically used at different locations on a construction site, the analysis is based on the closest estimated average distances that construction equipment would operate in a typical hour on the Project construction site relative to the surrounding sensitive receptors. Stationary equipment, such as air compressors (used during the architectural coating phase), are assumed to be staged away from sensitive receptors, consistent with PDF N1.

TABLE 7
ESTIMATED MAXIMUM CONSTRUCTION EQUIPMENT NOISE LEVELS

Location / Receptor	Construction Phase	Distance (ft)	Construction Noise Level at Receptor with Project Design Features [a] (dBA L_{eq})	Significance Threshold	Exceed Threshold?
At 50 Feet	Site Preparation	50	71.2	75	No
	Grading/Excavation		74.6		No
	Drainage/Utilities/Trenching		67.7		No
	Foundations/Concrete Pour		72.6		No
	Building Construction		67.5		No
	Paving		71.5		No
	Architectural Coating		64.0		No

[a] Construction noise levels account for a 10 dBA reduction from noise barriers required in PDF N1.

SOURCE: ESA, 2019.

With the incorporation of PDF N1, N2, and N3, construction noise levels were estimated to reach a maximum of 74.6 dBA L_{eq} at 50 feet during the grading/excavation phase, which would not exceed the standard set forth in LAMC Section 112.05, which sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Since the Project would not exceed the standard set forth in LAMC Section 112.05, the Project would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the noise ordinance and impacts would be less than significant.

(b) Off-Site Construction Noise

Delivery, haul truck, and worker vehicle trips would occur throughout the construction period. The Project's maximum off-site construction noise levels would be generated during the construction period with the greatest number of truck trips, which would be during grading/excavation work. The grading/excavation work, which would include grading/excavating the Project Site and exporting the soil, would generate approximately 8 truck trips per hour (4 inbound and 4 outbound trips), and 10 worker trips during a peak hour. The trucks and workers traveling to and from the Project Site would be anticipated to utilize Vermont Avenue and/or Exposition Boulevard, which connect to the regional freeways (Interstate 10 and Interstate 110). As a conservative analysis, all peak hour truck and worker vehicle trips were modeled to travel on Vermont Avenue and Exposition Boulevard. The combined traffic noise levels from the Project's construction trucks and worker vehicles along these roadway segments would generate the maximum off-site construction noise levels from the Project. As shown in **Table 8**, *Estimate Maximum Off-Site Construction Traffic Noise,* the Project's truck trips and worker trips would generate noise levels of approximately up to 56.4 dBA Leq along the modeled roadway segments. The Project's off-site construction noise would not exceed the existing ambient noise level by more than 5 dBA; therefore, off-site construction noise impacts would be less than significant.

TABLE 8
ESTIMATE MAXIMUM OFF-SITE CONSTRUCTION TRAFFIC NOISE LEVELS

Roadway Segment	Existing (A)	Calculated Traffic Noise Levels On Roadway dBA Leq		
		Construction Traffic (B)	Significance Threshold	Exceed Threshold?
Vermont Avenue				
Between I-10 Ramps and Exposition Boulevard	69.1	56.4	5	No
Exposition Boulevard				
Between Vermont Avenue and I-110 Ramps	66.8	54.6	5	No

SOURCE: ESA, 2019.

(v) Operations

(a) Open Space Noise

Open space noise levels at the noise sensitive receptors are summarized in **Table 9**, *Estimated Open Space Noise Levels*. Noise sensitive receptor locations R1 and R2 would only be affected by the northeast outdoor terrace as the line-of-sight to the southeast outdoor terrace would be completely blocked by the Project building itself. Noise sensitive receptor location R3 would not be affected by the northeast or southeast terraces as the line-of-sight would be completely blocked by the Project building itself. Noise sensitive receptor location R4 would only be affected by the southeast outdoor terrace as the line-of-sight to the northeast outdoor terrace would be completely blocked by the Project building itself. Noise sensitive receptor location R5 would be affected by both the northeast and southeast outdoor terraces. As shown, the Project's open space noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 9
ESTIMATED OPEN SPACE NOISE LEVELS (L_{EQ})

Receptor Location	Distance (feet)	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Open Space Noise Levels, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold, dBA (L_{eq})	Exceed Significance Threshold
R1	70	68.4	43.9	68.4	73.4	No
R2	46	61.8	47.5	62.0	66.8	No
R3	N/A	57.5	Fully shielded	57.5	62.5	No
R4	87	58.3	42.9	58.4	63.3	No
R5	120	70.8	42.2	70.8	75.8	No

SOURCE: ESA, 2019.

***(b)* On-Site Fixed Mechanical Equipment Noise**

All mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, sound enclosures, and/or sound screen/parapet walls, to comply with the noise limitation requirements provided in Section 112.02 of the LAMC, which prohibits the noise from such equipment from causing an increase in the ambient noise level by

more than five decibels. To meet this standard, the noise generated from the Project's fixed mechanical equipment must be at least 10 dBA below ambient noise levels, as noise levels lower than ambient conditions can contribute to the general ambient sound level. Therefore, the Project would install mechanical equipment so that it would generate noise levels below this threshold in compliance with applicable regulatory requirements. This can be accomplished through appropriate noise control devices, such as sound attenuators, acoustics louvers, sound enclosures, and/or sound screen/parapet walls. The inclusion of sound buffering enclosures, parapets, etc. is consistent with the requirements in PDF N2. Therefore, compliance with the City's code requirements would ensure that operation of the Project's fixed mechanical equipment would not exceed the City's thresholds of significance and that impacts would be less than significant.

(c) On-Site Loading and Refuse Service Areas Noise

Loading dock activities, such as truck movements/idling and loading/unloading operations, would generate noise levels that would have the potential to adversely impact adjacent land uses during long-term Project operations. An on-site loading and refuse service area would be located in the ground level on the south side of the on-site circulation route near the subterranean parking ramp that would be accessed from Vermont Avenue. The loading and refuse service area would be shielded from view. Pursuant to PDF N2, truck loading/unloading activity shall be prohibited between the hours of 10:00 p.m. and 7:00 a.m.

The refuse service area would be located near the loading dock area on the ground level in a fully enclosed area, which would block the contribution to ambient noise. Therefore, refuse-related noise would be negligible at off-site sensitive receptor locations and would not substantially contribute to an increase in ambient noise levels.

Loading area noise levels at the noise sensitive receptors are summarized in **Table 10**, *Estimated Loading Area Noise Levels*. Noise sensitive receptor locations R1 through R3 would be largely shielded from the noise (minimum 10 dBA reduction), while R4 and R5 would be fully shielded by the Project buildings and would not be affected by the loading area noise. As shown, the Project's loading area noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 10
ESTIMATED LOADING AREA NOISE LEVELS (L_{EQ})

Receptor Location	Distance (feet)	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Loading Area Noise Levels, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold, dBA (L_{eq})	Exceed Significance Threshold
R1	90	68.4	54.9	68.6	73.4	No
R2	120	61.8	52.4	62.3	66.8	No
R3	50	57.5	60.0	61.9	62.5	No
R4	N/A	58.3	Fully shielded	58.3	63.3	No
R5	N/A	70.8	Fully shielded	70.8	75.8	No

SOURCE: ESA, 2019.

(vi) On-Site Parking Area Noise

Vehicle parking would be located within one subterranean levels and at-grade. Vehicle access (ingress/egress) would be provided from one entrance along Vermont Avenue, at the northeast property line. Sources of noise associated with parking areas typically include engines accelerating, doors slamming, car alarms, horns honking, tire squeals, and people talking. Noise levels at these facilities would fluctuate throughout the day with the amount of vehicle and human activity. Noise levels would generally be the highest in the morning and evening peak traffic hours when the largest number of vehicles would enter and exit the parking structures.

Parking area noise levels at the noise sensitive receptors are summarized in **Table 11**, *Estimated Parking Area Noise Levels*. As shown, the Project's parking area noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 11
ESTIMATED PARKING AREA NOISE LEVELS (L_{EQ})

Receptor Location	Distance (feet)	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Parking Area Noise Levels, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold, dBA (L_{eq})	Exceed Significance Threshold
R1	25	68.4	47.1	68.4	73.4	No
R2	55	61.8	40.3	61.8	66.8	No
R3	25	57.5	47.1	57.9	62.5	No
R4	N/A	58.3	Fully shielded	58.3	63.3	No
R5	145	70.8	31.8	70.8	75.8	No

SOURCE: ESA, 2019.

(vii) Off-Site Operational Noise

(a) Existing Baseline Conditions

Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the "No Project" condition. Project impacts are shown in **Table 12**, *Off-Site Traffic Noise Impacts – Existing (2019) Baseline Conditions.* As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.1 dBA, CNEL, which is well below the threshold of a 5 dBA CNEL increase for areas characterized by normally acceptable or conditionally acceptable noise levels and well below the threshold of 3 dBA for areas characterized by normally unacceptable or clearly unacceptable noise levels. Accordingly, the projected Project operational roadway noise increases would be below the applicable thresholds, and impacts would be less than significant.

TABLE 12
OFF-SITE TRAFFIC NOISE IMPACTS – EXISTING (2019) BASELINE CONDITIONS

Roadway Segment	Calculated Traffic Noise Levels, CNEL (dBA) [a]			
	Existing (A)	Existing plus Project (B)	Project Increment (B-A)	Exceed Threshold?
Vermont Avenue				
North of I-10 Westbound Ramps	71.1	71.1	0.0	No
Between I-10 Westbound Ramps and I-10 Eastbound Ramps	71.2	71.2	0.0	No
Between I-10 Eastbound Ramps and Adams Boulevard	70.8	70.8	0.0	No
Between Adams Boulevard and Jefferson Boulevard	70.1	70.1	0.0	No
Between Jefferson Boulevard and 36th Place	70.0	70.1	0.1	No
Between 36th Place and Exposition Boulevard	70.0	70.1	0.1	No
South of Exposition Boulevard	69.4	69.4	0.0	No
Figueroa Street				
North of Jefferson Boulevard	68.1	68.1	0.0	No
Between Jefferson Boulevard and Exposition Boulevard/37th St.	68.3	68.3	0.0	No
South of Exposition Boulevard/37th Street	68.5	68.5	0.0	No
I-110 Southbound Off-Ramp / Flower Street				
North of Exposition Boulevard	66.9	66.9	0.0	No
South of Exposition Boulevard	66.4	66.4	0.0	No
I-110 Northbound Off-Ramp / Hope Street				
North of 37th Street	67.6	67.6	0.0	No
South of 37th Street	65.3	65.3	0.0	No
I-10 Westbound Ramps				
West of Vermont Avenue	61.2	61.2	0.0	No
East of Vermont Avenue	64.0	64.1	0.1	No
I-10 Eastbound Ramps				
West of Vermont Avenue	61.1	61.1	0.0	No
East of Vermont Avenue	66.5	66.5	0.0	No
Adams Boulevard				
West of Vermont Avenue	69.1	69.1	0.0	No
East of Vermont Avenue	69.4	69.4	0.0	No
Jefferson Boulevard				
West of Vermont Avenue	70.4	70.4	0.0	No
Between Vermont Avenue and Figueroa Street	69.4	69.4	0.0	No
East of Figueroa Street	67.9	68.0	0.1	No
36th Place				
West of Vermont Avenue	58.9	59.0	0.1	No
East of Vermont Avenue	60.1	60.1	0.0	No
Exposition Boulevard				
West of Vermont Avenue	67.8	67.8	0.0	No
Between Vermont Avenue and Figueroa Street	68.6	68.7	0.1	No
Between Figueroa St. and I-110 Southbound Off-Ramp / Flower St.	67.1	67.2	0.1	No
East of I-110 Southbound Off-Ramp / Flower Street	65.3	65.3	0.0	No
37th Street				
Between Figueroa St. and I-110 Northbound Off-Ramp / Hope St.	66.6	66.7	0.1	No
East of I-110 Northbound Off-Ramp / Hope Street	64.6	64.6	0.0	No

Roadway Segment	Calculated Traffic Noise Levels, CNEL (dBA) [a] Existing (A)	Existing plus Project (B)	Project Increment (B-A)	Exceed Threshold?

[a] Calculated at the property lines of land uses along roadway segments.
SOURCE: ESA, 2019.

(b) Future Conditions

Future roadway noise levels were also calculated along various roadway segments near the Project to establish future baseline traffic noise levels that would occur with implementation of the related projects, to which the Project's offsite traffic noise during operations could be added. Project impacts are shown in **Table 13**, *Off-Site Traffic Noise Impacts – Future (2023) Conditions.* As indicated, the maximum increase in Project-related traffic noise levels over the future traffic noise levels would be 0.1 dBA CNEL, which is well below the threshold of a 5 dBA CNEL increase for areas characterized by normally acceptable or conditionally acceptable noise levels and well below the threshold of 3 dBA for areas characterized by normally unacceptable or clearly unacceptable noise levels. Accordingly, Project-related increases in traffic noise under Future Traffic Conditions would be below the applicable thresholds, and impacts would be less than significant.

TABLE 13
OFF-SITE TRAFFIC NOISE IMPACTS – FUTURE (2023) CUMULATIVE INCREMENT

Roadway Segment	Calculated Traffic Noise Levels, CNEL (dBA) [a] Future (A)	Future plus Project (B)	Project Increment (B-A)	Exceed Threshold?
Vermont Avenue				
North of I-10 Westbound Ramps	72.0	72.0	0.0	No
Between I-10 Westbound Ramps and I-10 Eastbound Ramps	71.8	71.8	0.0	No
Between I-10 Eastbound Ramps and Adams Boulevard	71.3	71.3	0.0	No
Between Adams Boulevard and Jefferson Boulevard	70.9	71.0	0.1	No
Between Jefferson Boulevard and 36th Place	70.3	70.4	0.1	No
Between 36th Place and Exposition Boulevard	70.4	70.4	0.0	No
South of Exposition Boulevard	69.6	69.6	0.0	No
Figueroa Street				
North of Jefferson Boulevard	68.6	68.6	0.0	No
Between Jefferson Boulevard and Exposition Boulevard/37th St.	68.7	68.7	0.0	No
South of Exposition Boulevard/37th Street	68.9	68.9	0.0	No
I-110 Southbound Off-Ramp / Flower Street				
North of Exposition Boulevard	67.1	67.1	0.0	No
South of Exposition Boulevard	66.6	66.6	0.0	No
I-110 Northbound Off-Ramp / Hope Street				
North of 37th Street	68.0	68.0	0.0	No

Roadway Segment	Calculated Traffic Noise Levels, CNEL (dBA) [a] Future (A)	Future plus Project (B)	Project Increment (B-A)	Exceed Threshold?
South of 37th Street	65.6	65.6	0.0	No
I-10 Westbound Ramps				
West of Vermont Avenue	62.3	62.3	0.0	No
East of Vermont Avenue	64.6	64.7	0.1	No
I-10 Eastbound Ramps				
West of Vermont Avenue	61.7	61.8	0.1	No
East of Vermont Avenue	67.3	67.3	0.0	No
Adams Boulevard				
West of Vermont Avenue	69.9	69.9	0.0	No
East of Vermont Avenue	70.4	70.4	0.0	No
Jefferson Boulevard				
West of Vermont Avenue	70.6	70.6	0.0	No
Between Vermont Avenue and Figueroa Street	69.7	69.7	0.0	No
East of Figueroa Street	68.2	68.2	0.0	No
36th Place				
West of Vermont Avenue	59.0	59.1	0.1	No
East of Vermont Avenue	60.2	60.2	0.0	No
Exposition Boulevard				
West of Vermont Avenue	68.1	68.1	0.0	No
Between Vermont Avenue and Figueroa Street	68.9	69.0	0.1	No
Between Figueroa St. and I-110 Southbound Off-Ramp / Flower St.	67.4	67.4	0.0	No
East of I-110 Southbound Off-Ramp / Flower Street	65.6	65.6	0.0	No
37th Street				
Between Figueroa St. and I-110 Northbound Off-Ramp / Hope St.	67.0	67.0	0.0	No
East of I-110 Northbound Off-Ramp / Hope Street	64.8	64.8	0.0	No

[a] Calculated at the property lines of land uses along roadway segments.

SOURCE: ESA, 2019.

(viii) Composite Noise

An evaluation of the combined noise from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. Noise sources associated with the Project would include traffic on nearby roadways, open space, on-site mechanical equipment, loading area, and parking area.

Composite noise levels at the noise sensitive receptors are summarized in **Table 14**, *Estimated Composite Noise Levels from Project Operations*. As shown, the Project's composite noise contribution would not increase the ambient noise by more than 5 dBA; therefore, impacts would be less than significant.

TABLE 14
ESTIMATED COMPOSITE NOISE LEVELS FROM PROJECT OPERATIONS

	Noise Levels, dBA Leq				
Operational Noise Sources	**R1**	**R2**	**R3**	**R4**	**R5**
Existing (Ambient) Noise Level (A) [a]	**68.4**	**61.8**	**57.5**	**58.3**	**70.8**
Project Composite Noise Sources					
Open space	43.9	47.5	Fully shielded	42.9	42.2
Mechanical equipment	48.4	51.8	47.5	48.3	< 47.5
Loading and refuse area	54.9	52.4	60.0	Fully shielded	Fully shielded
Parking Structure	47.1	40.3	47.1	Fully shielded	31.8
Off-site traffic (Project only, Leq) [b]	52.0	43.0	N/A	N/A	52.0
Project Composite Noise Level (B) [c]	**57.9**	**56.1**	**60.4**	**49.4**	**53.7**
Existing Plus Project Composite Noise Level (C = A + B) [c]	**68.8**	**62.8**	**62.2**	**58.8**	**70.9**
Project Increment (C minus A)	0.4	1.0	4.7	0.5	0.1
Exceeds Threshold?	No	No	No	No	No

[a] See Table 6.

[b] R1 and R5: Vermont Street between 36th Place and Exposition Boulevard. R2: 36th Place west of Vermont. R3: No Project-related traffic on W. 37th Street. R4: No Project-related traffic on W. 37th Street.

[c] Values are added logarithmically (not linearly).

SOURCE: ESA 2019.

b) Generation of excessive groundborne vibration or groundborne noise levels?

(ix) Construction

(a) Structural Impacts

The PPV vibration velocities for off-road construction equipment that would be used for the Project and could generate groundborne vibration are provided in **Table 15**, *Estimated Construction Equipment Vibration Levels – Structural Damage*. The vibration velocity levels are estimated at the nearest off-site structures to the Project Site at locations R1 through R5. The structures at locations R1, R2, and R3 are evaluated as Category III receptors with a significance threshold of 0.2 in/sec PPV.[82] The multi-family residential receptor located at R4 is evaluated as a Category II receptor with a significance threshold of 0.3 in/sec PPV.[83] The reinforced buildings at location R5 are evaluated as Category I receptors with a significance threshold of 0.5 in/sec PPV.[84] As shown, construction of the Project would not exceed the significance thresholds for structural damage and impacts would be less than significant.

TABLE 15
ESTIMATED CONSTRUCTION EQUIPMENT VIBRATION LEVELS – STRUCTURAL DAMAGE

Receptor Location	Distance (feet)	Activity/Equipment	Estimated Peak Particle Velocity (in/sec PPV)	Significance Threshold (in/sec PPV)	Exceed Significance Threshold
R1	20	Caisson Drilling	0.124	0.2	No
	20	Loaded Trucks	0.106	0.2	No

[82] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 186, 2018.*

[83] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 186, 2018.*

[84] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, page 186, 2018.*

Receptor Location	Distance (feet)	Activity/Equipment	Estimated Peak Particle Velocity (in/sec PPV)	Significance Threshold (in/sec PPV)	Exceed Significance Threshold
	20	Small Bulldozer	0.004	0.2	No
	50	Caisson Drilling	0.031	0.2	No
R2	50	Loaded Trucks	0.027	0.2	No
	50	Small Bulldozer	0.001	0.2	No
	20	Caisson Drilling	0.124	0.2	No
R3	20	Loaded Trucks	0.106	0.2	No
	20	Small Bulldozer	0.004	0.2	No
	75	Caisson Drilling	0.017	0.3	No
R4	75	Loaded Trucks	0.015	0.3	No
	75	Small Bulldozer	0.001	0.3	No
	125	Caisson Drilling	0.008	0.5	No
R5	125	Loaded Trucks	0.007	0.5	No
	125	Small Bulldozer	< 0.001	0.5	No

SOURCE: ESA, 2019.

On-road rubber-tired haul and delivery trucks would travel to and from the Project Site along the local roadway network. According to the FTA, the vibration generated by a typical on-road rubber-tired heavy-duty truck traveling on paved surfaces, such as a driveway or roadway, would be between 60 and 65 VdB and is rarely perceptible at 50 feet from the source.[85] In order to provide a conservative analysis, it is assumed a truck could generate 70 VdB (0.013 in/sec PPV) accounting for geologic conditions, vehicles with stiff suspension systems, or unusually rough road conditions. With a groundborne vibration level of 0.013 in/sec PPV adjacent to a truck, which would decrease with increasing distance between the truck and receptor location, on-road rubber tired trucks would not exceed the significance thresholds of 0.2 in/sec PPV, 0.3 in/sec PPV, or 0.5 in/sec PPV for structural damage. Therefore, the Project's construction related groundborne vibration impacts from off-site construction traffic would not result in the exposure of nearby off-site structures to the generation of vibration levels in excess of significance thresholds and impacts would be less than significant.

(b) Human Annoyance

The velocity decibels for off-road construction equipment that would be used for the Project and could generate groundborne vibration and groundborne noise are provided in **Table 16**, *Estimated Construction Equipment Vibration Levels – Human Annoyance*. As shown, for large off-road vibration-generating equipment (drilling and loaded trucks) used at the closest distance to residential structures, the vibration velocity levels at locations R2 and R3 would exceed the thresholds of 72 VdB for frequent events (more than 70 events per day), 75 VdB for occasional events (30 to 70 events per day), and 80 VdB for infrequent events. Small bulldozers would not generate groundborne vibration in excess of the thresholds at locations R2 and R3.

At location R4, the vibration levels would exceed the threshold of 72 VdB for frequent events but would not exceed the thresholds of 75 VdB for occasional events or 80 VdB for infrequent events. Vibration levels at R4 would only exceed the threshold of 72 VdB from drilling for frequent events

[85] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, pages 112-113, 2018.*

at a very small portion of the Project Site at the extreme southern edge. However, construction would not generate frequent drilling vibration events within this small area; therefore, human annoyance impacts at R4 would not exceed the applicable occasional or infrequent thresholds. Loaded trucks and small bulldozers would not generate groundborne vibration in excess of the thresholds at location R4.

The vibration velocity levels from large off-road vibration-generating equipment (drilling and loaded trucks) at location R1 would exceed the thresholds of 75 VdB for frequent events (more than 70 events per day), 78 VdB for occasional events (30 to 70 events per day), and 83 VdB for infrequent events. At location R5, the vibration levels would not exceed the thresholds. Small bulldozers would not generate groundborne vibration in excess of the thresholds at locations R1 and R5.

TABLE 16
ESTIMATED CONSTRUCTION EQUIPMENT VIBRATION LEVELS – HUMAN ANNOYANCE

Receptor Location	Distance (feet)	Activity/Equipment	Estimated Velocity Decibels (VdB)
R1	20	Caisson Drilling	89.9
	20	Loaded Trucks	88.9
	20	Small Bulldozer	60.9
R2	50	Caisson Drilling	78.0
	50	Loaded Trucks	77.0
	50	Small Bulldozer	49.0
R3	20	Caisson Drilling	89.9
	20	Loaded Trucks	88.9
	20	Small Bulldozer	60.9
R4	75	Caisson Drilling	72.7
	75	Loaded Trucks	71.7
	75	Small Bulldozer	43.7
R5	125	Caisson Drilling	66.0
	125	Loaded Trucks	65.0
	125	Small Bulldozer	37.0

SOURCE: ESA, 2019.

In accordance with Section 41.40 of the LAMC, which prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday, construction vibration-generation activities would not occur during the nighttime hours when people normally sleep and would not occur on Sundays when church services are normally in session. Thus, compliance with Section 41.40 of the LAMC would eliminate the potential for groundborne vibration and groundborne noise human annoyance impacts at the nearby residential uses (locations R2, R3, and R4) during sensitive nighttime hours when people normally sleep and at the nearby church use (location R1) when Sunday church services normally occur.

PDF N3 requires the construction contractor to manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and avoid the use of vibrating equipment

where possible to avoid construction vibration impacts. In compliance with PDF N3, loaded trucks would be confined to the eastern half of the Project Site away from locations R2 and R3, and in the southeastern quadrant of the Project Site when the church facility is occupied and church activities are being conducted at location R1. The construction contractor would manage construction phasing and scheduling of drilling activities with neighboring locations (R1, R2, and R3) so as to not occur during sensitive time periods, such as during periods of sleep at the nearby residential uses or during religious services at the adjacent church use, to avoid construction vibration human annoyance impacts. With Project compliance with Section 41.40 of the LAMC and implementation of PDF N3, including the specific compliance actions described above, groundborne vibration and groundborne noise human annoyance impacts would be less than significant.

(x) Operations

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration at low levels that would not cause damage or annoyance impacts to the Project buildings or on-site occupants and would not cause groundborne vibration and groundborne noise impacts to the off-site environment. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking areas. According to the FTA, if the roadway is fairly smooth, the vibration from rubber-tired traffic is rarely perceptible, with the threshold of perception for humans at approximately 65 VdB.[86] The Project's parking areas would be paved with smooth and maintained surfaces and vehicles would be traveling at very low speeds minimizing vibration levels. Parking area vibration would also be confined to the immediate area and would not be expected to be perceptible off the Project Sites. Therefore, parking area vibration would not exceed the significance threshold of 72 dBA at off-site residential uses and 75 VdB at off-site institutional uses. According to America Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), pumps or compressors would generate groundborne vibration levels of 0.5 in/sec PPV at 1 foot.[87] At 25 feet, this vibration level drops to approximately 0.004 in/sec PPV (approximately 60 VdB), which is below the threshold.[88] Furthermore, Project mechanical equipment, including air handling units, condenser units, and exhaust fans, would be located on building rooftops reducing the potential for vibrations to cause noticeable groundborne vibration and groundborne noise off the Project Site. Therefore, groundborne vibration from the operation of such mechanical equipment would not impact any of the off-site sensitive receptors. As a result, groundborne vibration and groundborne noise vibration impacts from Project operation would be less than significant.

Mitigation Measures

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[86] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, pages 112 and 113, 2018.*

[87] *America Society of Heating, Refrigerating and Air-Conditioning Engineers, Inc., Heating, Ventilating, and Air-Conditioning Applications, 1999.*

[88] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, pages 111, 184 and 185, 2018.*

The Project would comply with Mitigation Measures N1 and N2 from the Certified EIR.

3.13.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant noise impacts beyond those already identified in Certified EIR.

3.13.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

3.13.5 Mitigation Measures Addressing Impacts

As stated above, the Project would implement Mitigation Measures N1 and N2 from the Certified EIR. Implementation of these measures would ensure that the Project's impacts with respect to noise and vibration are less than significant.

3.13.6 Conclusion

Based on the above, no new significant noise impacts or a substantial increase in previously identified noise impacts would occur as a result of the Project. Therefore, the impacts to noise as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.14 Population and Housing

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
POPULATION AND HOUSING: 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)?	Less Than Significant	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less Than Significant	No	No	No	No

3.14.1 Impact Determination in the EIR

Population Growth

According to the Certified EIR, with implementation of the Plan, The Proposed Plans allow for increased development in the CPAs within targeted areas to both accommodate housing and population growth projected by SCAG in 2035, and to be consistent with the City's General Plan Framework Element, which calls for growth to be focused in higher intensity commercial centers close to transportation and services. The level of growth under the Proposed Plans is also consistent with Citywide projections and is not considered substantial with respect to anticipated growth in the City as a whole. The Proposed Plans direct growth to targeted areas that can accommodate greater development, including transit-oriented development (TOD) areas, while protecting residential neighborhoods and established industrial areas. The proposed increase in reasonably expected development would facilitate projected growth through the use of General Plan amendments, zone changes, and the establishment of the South Los Angeles and Southeast Los Angeles CPIO Districts, as described in Chapter 3.0 Project Description. Therefore, the Certified EIR concluded that the Plan is not inducing but rather accommodating anticipated growth, and impacts were determined to be less than significant.

Displace Housing

As discussed in the Certified EIR, the Plan would Implementation of the Proposed Plans would increase the levels of reasonably expected housing to 97,897 housing units in the South Los Angeles CPA and 80,487 housing units in the Southeast Los Angeles CPA. Under the Proposed

Plan, the South Los Angeles CPA would be able to provide an additional 15,711 housing units compared to the number of housing units in 2010 under existing conditions, and would essentially meet SCAG's 2035 housing projection of 97,900 housing units. For the Southeast Los Angeles CPA, the increase in housing units with 11,836 additional units provided under the Proposed Plan compared to the number of housing units in 2010 under existing conditions, would exceed SCAG's 2035 projection of 76,200 housing units. The increase in reasonably expected housing anticipated under the Proposed Plans can be expected to provide a total of 178,384 housing units, which accommodates SCAG's 2035 housing projection of 174,100 housing units for both CPAs. Therefore, with adoption of the Proposed Plans, the South and Southeast Los Angeles CPAs could accommodate housing demand projected by SCAG by the year 2035. Compared to the reasonably expected number of housing units under the Current Plan for the South Los Angeles CPA which was 91,015 housing units, this represents an increase of 8,829 housing units, or approximately 10 percent. Compared to the reasonably expected number of housing units under the Current Plan for Southeast Los Angeles which was 70,632 housing units, this represents an increase of 9,855 housing units, or 14 percent. As previously discussed, many Active Change Areas in the CPAs allow for increased housing opportunities through mixed-use residential development with greater floor area and height along select corridors and near transit stations. This targeted growth is primarily located on major commercial corridors where the majority of the existing uses include retail and commercial uses. There are generally no Active Change Areas proposed within residential neighborhoods. In a few cases Active Change Areas are proposed on land that is currently planned and zoned residential, but these instances are limited and occur along major corridors or in close proximity to Metro light rail stations. Therefore, implementation of the Proposed Plans would not displace substantial numbers of existing housing, and impacts related to housing displacement are less than significant.

Mitigation Measures

Impacts related to population and housing were determined to be less than significant for the Plan, and therefore, no mitigation measures were required.

3.14.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Population Growth

The project does not propose residential uses, therefore, the Project would not result in a change in the population or housing estimates from those contemplated in the Certified EIR, and impacts would be less than significant.

Displace Housing

The project site is currently a vacant lot and the project does not propose residential uses. Therefore, the Project would not displace any existing housing units that would necessitate the construction of replacement housing elsewhere. As such, Project impacts would be less than significant and would not exceed those already identified in the Certified EIR.

Mitigation Measures

None required.

3.14.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant population and housing impacts beyond those already identified in the Certified EIR.

3.14.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population and housing have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

3.14.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on population and housing impacts, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.14.6 Conclusion

Based on the above, no new significant population and housing impacts or a substantial increase in previously identified population and housing impacts would occur as a result of the Project. Therefore, the impacts to population and housing as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.15 Public Services and Recreation

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
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:					
(a) Fire protection?	Less Than Significant	No	No	No	No
(b) Police protection?	Less Than Significant	No	No	No	No
(c) Schools?	Less Than Significant	No	No	No	No
(d) Parks?	Significant and Unavoidable	No	No	No	No
(e) Other public facilities?	Less Than Significant	No	No	No	No

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
RECREATION					
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Significant and Unavoidable	No	No	No	No
(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	No	No	No	No

3.15.1 Impact Determination in the EIR

Fire

As discussed in the Certified EIR, construction activities would have the potential to temporarily increase the existing demand on fire protection and emergency medical services. Construction activities could potentially expose combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings and lighted cigarettes. However, in compliance with OSHA requirements, construction managers and personnel would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained onsite. Project construction would also comply with requirements and policies relating to fire safety practices. Road and lane closures due to construction activities related to individual projects could affect response times of fire and emergency services vehicles. Traffic delays caused by potential closures could impede the ability of emergency vehicles to efficiently move along roadways to their destination. Additionally, road closure may result in detours that adversely impact response time. However, as discussed in Section 4.12, Traffic and Transportation of the Certified EIR, individual projects would be required to develop a construction staging and traffic management plan, as necessary to ensure emergency access is maintained, consistent with LAFD requirements. Therefore, the Plan would result in a less than significant construction impact related to fire protection services and emergency medical services.

While the Plan could impact segment-level LOS, there is not a direct relationship between predicted travel delay and emergency response times as California State law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. The Plan Area is not within a hillside area or located where there are increased hazards due to a design feature or incompatible use; the Plan Area is in an urbanized environment where there is sufficient street access for emergency response. The LAFD in collaboration with LADOT has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City. The City of Los Angeles has over 205 miles of routes equipped with FPS. LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, would act to maintain response times. Accordingly, the Certified EIR determined that the Plan would have a less than significant operational impact on fire protection and emergency medical services.

Police

An increase in the number of residents and employees, and amount of development within the Plan Area would create increased demand for LAPD services. However, due to the mobile nature of police services, it is unlikely that the need for additional officers created by the increase in demand for police services would result in the need for the construction of new or physically altered police protection facilities. Additional police service demands can be accommodated through a variety of methods, including overtime or provision of substations in existing structures, which would increase police protection without the need for construction of new stations.

While the Plan could impact segment-level LOS, there is not a direct relationship between predicted travel delay and emergency response times as California State law requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicles have passed. Designated emergency and disaster routes within the Plan Area would be maintained. In conformance with existing policies, procedures and practices, as development occurs, the LAPD will maintain acceptable service levels through the provision of additional personnel and equipment as needed. Impacts to police services are addressed through standard city policies, procedures, and practices. Therefore, the Certified EIR concluded that implementation of the Plan would result in a less than significant impact related to police protection services.

Schools

LAUSD enrollment forecasts are limited to five-year increments and do not extend out to 2035, and, thus, a comparison to LAUSD forecasts for the plan horizon year is not possible. While the increase in student enrollment resulting from the Plan could be accommodated by the current capacity for the middle schools and high schools serving the Plan Area, the current capacity at elementary schools serving the Plan Area would not accommodate the number of new students that could be generated by the Plan. In the event that LAUSD constructs a new school or physically alter an existing facility, a project-specific environmental analysis would be required to address site-specific environmental concerns.

All development in California is subject to California Government Code Section 65995, which allows LAUSD to collect impact fees from developers of new residential and commercial/industrial space. Per current State law, developer impact fees are the exclusive method for mitigating impacts on school facilities. These fees collected on residential and commercial development may be used to pay for all of the following: land (purchased or leased) for school facilities, design of school facilities, permit and plan checking fees, construction or reconstruction of school facilities, testing and inspection of school sites and school buildings, furniture for use in new school facilities, and interim school facilities (purchased or leased) to house students generated by new development while permanent facilities are constructed. Payment of these fees would assist in funding efforts necessary to alleviate school overcrowding and would ensure that new development under the Plan would bear its fair share of the cost of accommodating additional students generated. With payment of appropriate fees, impacts were determined to be less than significant.

Parks and Recreation

Future development under the Plan would be subject to LAMC Sections 12.33 and 17.12, which are part of the City's implementation of the Quimby Act. These ordinances require developers of residential projects to dedicate land for park and recreation purposes, or pay a fee in lieu thereof, prior to obtaining a building permit. The dedication of land for park and recreation purposes or payment of fees and implementation of Plan policies, programs, and development standards would slightly offset the demand created by future development under the Plan. Generally, development of parks in the CPAs would be expected to have impacts consistent with those

analyzed in this EIR or potentially be eligible for an infill exemption. Impacts related to future park sites would be speculative at this time. Therefore, impacts related to the construction of new parks or recreational facilities would be less than significant.

Libraries

Implementation of the Plan with Alternative Compliance scenario would guide development through 2035 and is anticipated to result in an additional 43,482 residents compared to existing conditions. While the increase in population as a result of the Plan may create a demand for library services, residential units within new buildings would have internet access to alleviate some of the need for library services and resources. Accordingly, the Plan would not create substantial capacity or service level problems that would require the provision of new or physically altered library facilities in order to maintain an acceptable level of service for libraries. The Certified EIR therefore determined that the Plan would result in a less than significant impact with respect to libraries.

Mitigation Measures

Impacts related to fire, police, schools, and libraries were determined to be less than significant for the Plan, and therefore, no mitigation measures were required. Impacts to parks were determined to be significant, but no feasible mitigation measures were identified in order to reduce this impact.

3.15.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Fire

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

To comply with California Department of Industrial Relations (Cal-OSHA) and State and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[89] Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and State regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and

[89] https://www.dir.ca.gov/title8/1920.html.

implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, would be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General "good housekeeping" procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Traffic Management Plan (CTMP), which includes traffic management strategies for Project construction. The CTMP would outline and dictate how construction operations would be carried out, and would identify specific actions to reduce effects on the surrounding community. The CTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity.

In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. It is acknowledged that, even with the CTMP, the Project could incrementally increase traffic, which could potentially delay emergency response times. However, the Project's potential impacts are minimal given these other factors.

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, impacts on fire protection services associated with construction of the Project would be less than significant.

Operation

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (Plan Check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

Response Distance

The Project Site would be served by Station No. 15, within the South los Angeles Bureau, approximately ½-mile from the Project Site. LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion along the response route. For residential uses (such as the Project), the maximum response distance is 1.5 miles from the fire station to a project site. As the Project would be located approximately ½-mile from Station No. 15, the Project would be within the required response distance. Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as established emergency procedures, emergency stairways, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the Project Site's distance from the fire station, and the incorporation of fire protection systems within the proposed building, Project impacts related to response distance would be less than significant.

Emergency Access

The LAFD would review the Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Conclusion

Consistent with the ruling of *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated

Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts[90]. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Thus, the Project impacts on fire protection and emergency medical services would be less than significant.

Police

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security could include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

(1) Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;

(2) Construction impacts are temporary in nature and do not cause lasting effects; and

(3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant.

[90] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. See, Notice of Determination for Van Nuys Fire Station 39, at http://eng2.lacity.org/techdocs/emg/docs/vannuys_fs39/NOD_160701.pdf

Operation

The Project would include security features such as appropriate lighting in and around the proposed buildings and controlled access to the subterranean parking levels. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility. Emergency access to the Project Site would be provided by the existing street system. The Project's commercial nature would provide for natural surveillance by residents, particularly in the evening. Combined with the provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, the Project would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Project impacts related to police protection services would be less than significant.

Schools

According to LAUSD, additional facilities are necessary to serve overall student enrollment growth district-wide. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by Education Code Section 17620 or Government Code Sections 65970 and following may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. Subdivision (h) of section 65995 declares that the payment of the development fees authorized by Education Code Section 17620 is "full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities."[91] Therefore, mandatory compliance with the provisions of SB 50 regarding payment of school fees is deemed to provide full and complete mitigation of school facilities impacts and no further mitigation is required. Thus, with payment of the SB 50 fees, the Project's impacts with respect to schools would be less than significant. Furthermore, the project does not propose any residential uses.

Parks and Recreation

As discussed above under "Population and Housing," the Project would not generate any residents. Per the City's Public Recreation Plan's long-range citywide standard (two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks), the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 persons. Based on the combined neighborhood and community parkland per population ratio of four acres per 1,000 persons, the Project would not generate demand new neighborhood and community parkland

[91] Cal Gov Code Section 65995: http://codes.lp.findlaw.com/cacode/GOV/1/7/d1/4.9/s65995, accessed November 23, 2020.

While the Certified EIR stated that implementation of the Plan would create additional demand at park and recreational facilities, and concluded that there would be a significant and unavoidable impact with respect to park and recreational facilities, the Project itself would not result in any increased impacts beyond those contemplated in the Certified EIR.

In addition, the Project does not include the construction of recreational facilities outside of the Project Site boundaries, such as a park. Therefore, the Project does not involve the construction of recreational facilities that would have an adverse physical effect on the environment, and no impact would occur.

Libraries

As discussed above under "Population and Housing," the Project would generate zero residents. Therefore, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts.. Therefore, the Project would not result in any increased impacts beyond those contemplated in the Certified EIR, and impacts would be less than significant.

Mitigation Measures

None required.

3.15.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant public services impacts beyond those already identified in the Certified EIR.

3.15.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the EIR, and no new conditions have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts.

3.15.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact with respect to fire, police, schools, and libraries, no mitigation measures were required for these issues. The EIR also determined that no feasible mitigation measures were available to address the significant and unavoidable impacts with respect to parks and recreational facilities. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.15.6 Conclusion

Based on the above, no new significant public services impacts or a substantial increase in previously identified public services impacts would occur as a result of the Project. Therefore, the impacts to public services as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.16 Transportation

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
TRANSPORTATION / TRAFFIC: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less Than Significant	No	No	No	No
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	Significant and Unavoidable	No	No	No	Yes
(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	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

This section is based on the Certified EIR and the following items, which are included as **Appendix A** to this technical memorandum:

G-1 Transportation Assessment, Gibson Transportation Consulting, Inc., September 2019.

G-2 Transportation Assessment Letter, LADOT, February 12, 2020.

3.16.1 Impact Determination in the EIR

The Certified EIR found no impacts to the circulation system. Impacts to the Congestion Management Plan for Los Angeles County were determined to be significant and unavoidable. Impacts with respect to air traffic patterns were determined to have no impact. Impacts related to increased hazards due to a design feature or incompatible use were found to be less than significant. Impacts related to public transportation, bicycle, and pedestrian facilities were found to be less than significant.

3.16.2 Analysis

The following review of potential transportation impacts resulting from the Project is based on the Supplemental Memorandum analyzing vehicle miles traveled (VMT) and the Transportation Impact Study (TIS) prepared by Gibson Transportation Consulting, Inc. (included as Appendix A to this memorandum).

In accordance with the Appendix G of the State *CEQA Guidelines*, a project would result in potentially significant traffic impacts if the project would:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

d) Result in inadequate emergency access?

With regard to Threshold b), consistent with Senate Bill (SB) 743, Section 15064.3 of the CEQA Guidelines was adopted by OPR on December 28, 2018, and states that VMT is the appropriate measure of transportation impacts rather than level of service (LOS). The provisions must be implemented statewide by July 1, 2020. On July 30, 2019, the City adopted VMT as a criteria to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3.[92] However, the regulations of SB 743 had not been finalized or adopted by the City at the time the TIS was conducted for the Project, which was prepared in accordance with the approved MOU with LADOT. Therefore, an operational analysis based on LOS contained in the TIS as well as the VMT analysis are summarized below.

Mitigation Measures

The Certified EIR did not include mitigation measures to reduce impacts related to transportation and traffic.

3.16.3 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Methodology

SB 743, made effective in January 2014, required the Governor's Office of Planning and Research to change the CEQA Guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay (level of service [LOS]) to VMT, with the intent of reducing greenhouse gas emissions (GHG), creating multimodal networks, and promoting mixed-use developments.

LADOT's Transportation Assessment Guidelines (TAG) defines and provides the required methodology of analyzing a project's transportation impacts in accordance with SB 743.

[92] *City of Los Angeles, City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act, August 9, 2019, https://ladot.lacity.org/sites/g/files/wph266/f/VMT%20Guidelines%20Announcement%20-%20August%202019.pdf. Accessed September 6, 2019.*

Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying significant impacts:

- *Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies*
- *Threshold T-2.1: Causing Substantial VMT*
- *Threshold T-2.2: Substantially Inducing Additional Automobile Travel*
- *Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use*

These thresholds are reviewed and analyzed below. In addition, the analysis below provides a review of California Department of Transportation (Caltrans) facilities in accordance with *Interim Guidance for Freeway Safety Analysis*, which identifies City of Los Angeles requirements for a CEQA safety analysis of Caltrans facilities.

Conflicting with Plans, Programs, Ordinances, or Policies

Table 2.1-1 of the TAG provides the City plans, policies, programs, ordinances, and standards relevant in determining project consistency. Attachment D of the TAG provides a structured approach to evaluate whether a project conflicts with the City of Los Angeles plans, programs, ordinances, or policies and to streamline the review by highlighting the most relevant plans, policies, and programs when assessing potential impacts to the City of Los Angeles transportation system.

As stated in Section 2.1.4 of the TAG, a project that generally conforms with and does not obstruct the City of Los Angeles development policies and standards will generally be considered to be consistent. As discussed below, the Project is consistent and does not conflict with the City of Los Angeles plans, policies, programs, ordinances, and standards listed in Table 2.1-1 of the TAG. Therefore, the Project would not result in a significant impact under Threshold T-1. Detailed discussions of the plans, programs, ordinances, or policies related to the Project are provided below.

Mobility Plan

The Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

1. Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.
2. World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. Access for All Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.

4. Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.

5. Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

No streets immediately adjacent to the Project Site are designated as part of the Mobility Plan's mobility-enhanced networks. Although no specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed with the mobility-enhanced networks as a top priority, and the construction of the Project would not preclude the City of Los Angeles from implementing any mobility enhanced networks along streets within the Project area.

Access to the Project's subterranean parking garage and hotel valet loading area would be provided via one driveway on Vermont Avenue that would accommodate right-turn-only ingress and egress movements. The loading dock and trash facilities would be located in the parking garage on the ground floor. The Project driveway would be designed to minimize queuing on the adjacent street system that would block through traffic. The driveway would comply with LADOT standards. Adequate area would be provided within the parking garage to accommodate the vehicle and truck turning maneuvers.

The Project would not locate a driveway along a designated Boulevard or Avenue, thereby avoiding vehicle-pedestrian and vehicle-bicycle conflicts along any of the major corridors. In addition, the Project would provide sufficient off-street parking to satisfy LAMC requirements and would retain the existing on-street metered parking along the Project frontage.

The Project would also enhance pedestrian access along the Project frontage by providing improvements to the sidewalks and landscaping. Secured bicycle parking facilities within the Project Site would also be provided. Further, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with an existing or proposed bicycle facility. These measures would promote active transportation modes such as biking and walking, thereby reducing the Project VMT compared to the average for the area, as detailed further below. Thus, the Project would be consistent with the goals of the Mobility Plan.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of this plan focus on health and wellness through

increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

The Project prioritizes safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities. Further, the Project supports healthy lifestyles by locating jobs within walking distance, 0.25 miles, of transit (Metro Local and Rapid Bus Lines, Expo Line, etc.), providing bicycle amenities, and enhancing the pedestrian environment by providing landscaping for a more comfortable environment for pedestrians. Thus, the Project would be consistent with the goals of the Plan for a Healthy Los Angeles.

LAMC Section 12.21.A.16

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments, which require residential projects to provide both short-term and long-term bicycle parking. The Project's proposed bicycle spaces meet the LAMC requirements for on-site bicycle parking supply.

Vision Zero Action Plan / Vision Zero Corridor Plans

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a number of strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified numerous streets as part of the High Injury Network (HIN) where City projects will be targeted. The City has also created an Action Plan, which identifies the types of improvements that will be implemented.

Citywide Design Guidelines for Residential, Commercial, and Industrial Development

The Pedestrian-First Design approach of *Citywide Design Guidelines* focuses on urban design strategies that "create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street."

The Pedestrian-First Design guidelines are as follows:

- Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project would not introduce a new driveway on a designated Avenue or Boulevard in the Mobility Plan. Thus, no conflict point between pedestrians, bicyclists, and vehicles would be created.

The Project promotes pedestrian-first accommodations through street landscaping (including shade trees), wide sidewalks, high visibility connections, and proximity to transit. No transportation elements of the Project are in conflict with the Citywide Design Guidelines.

Conclusion - Consistency with Plans and Policies

The Project is consistent with the City plans and policies listed in Table 2.1-1 of the TAG along with the described documents above; therefore, the Project would not result in a significant impact under Threshold T-1.

Causing Substantial Vehicle Miles Traveled

(xi) Construction

Project construction would add haul trucks, equipment and delivery trucks and trips generated by the construction workers to the local roadway network. As indicated in PDF TR-1, the Applicant would prepare a Construction Management Plan that would minimize disruption to the surrounding community. The peak period of truck activity during construction would occur during excavation and grading of the Project Site. Haul trucks would travel on approved truck routes designated within the City and routes would be reviewed and approved by the City. Haul truck traffic would take the most direct route to the I-10 or the I-110 freeway ramps. Based on estimates from the Applicant, during excavation and grading up to 27 haul trucks (54 daily truck trips) per day would occur over a 45-workday period. This would result in approximately eight trips per hour (four inbound, four outbound) if occurring uniformly over a typical six-hour haul period within the typical construction activity hours of 7:00 AM and 6:00 PM. Assuming a Passenger Car Equivalent factor of 2.0, the 54 truck trips would be equivalent to 108 daily PCE trips. The eight hourly truck trips would be equivalent to 18 PCE trips (nine inbound, nine outbound) per hour. It is also anticipated that approximately 10 construction worker vehicles would arrive and depart from the Project Site each day. With the implementation of PDF TR-1, haul truck activity and worker trips to and from the Project Site would occur outside of the morning and afternoon peak hours where feasible. Therefore, no peak hour construction traffic impacts are expected during construction.

Approximately 29 construction worker vehicles would arrive and depart from the Project Site each day. The estimated number of daily trips associated with the construction workers is approximately 58 (29 inbound and 29 outbound trips), but nearly all of those trips would occur outside of the peak hours since the hours of construction typically require workers to be on-site before the weekday morning commuter peak period and allow them to leave before the afternoon commuter peak period (i.e., arrive at the site prior to 7:00 AM and depart before 3:00 PM or after 6:00 PM). Adequate parking for construction workers would be secured on-site. Workers will be restricted from parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site as part of the Construction Management Plan.

Construction activities are expected to be primarily contained within the Project Site boundaries. While encroachments into the public right-of-way (e.g., sidewalk) adjacent to the Project Site along Vermont Avenue are anticipated, travel lanes would be maintained in each direction on Vermont Avenue throughout the construction period and emergency access would not be impeded.

No bus stops are located adjacent to the Project Site. Therefore, no bus stop relocation or bus rerouting is required, and no temporary impacts to transit are expected. Project construction activities are anticipated to result in the temporary removal of up to five on-street metered parking spaces along Vermont Avenue.

Project construction is not expected to create hazards for drivers, bicyclists, or pedestrians as long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Management Plan.

With the implementation of PDF TR-1, traffic impacts during construction would be less than significant.

(xii) Operation

Pedestrian access would be provided at the hotel lobby and retail entrances on Vermont Avenue, as well as the hotel vestibule entrance adjacent to the hotel valet loading area. The Project would not mix pedestrian and automobile traffic and, therefore, no pedestrian impacts would occur.

Bicyclists would have the same access opportunities as pedestrian visitors. In order to facilitate bicycle use, bicycle parking spaces would be provided on-site, consistent with the Bicycle Parking Ordinance, Los Angeles Municipal Code (LAMC) Section 12.21.A16(a)(2). Dedicated bicycle routes currently exist on Vermont Avenue, and a dedicated bicycle lane network is proposed on Vermont Avenue under the Mobility Plan.

With regard to parking, the Project is required to provide a total of 90 vehicular parking spaces. With application of the maximum allowable reductions, the Project vehicular parking requirement would be 76 spaces. The hotel use requires one bicycle parking space per 10 rooms, and the retail use requires one bicycle parking space per 2,000 sf. The Project is required to provide a total of 40 (20 long-term and 20 short-term) bicycle parking spaces. The Project would comply with the applicable City requirements.

a) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The City's VMT Calculator determines a Project's VMT based on trip length information from the City's Travel Demand Forecasting (TDF) Model. The TDF Model considers the traffic analysis zone where the project is located to determine the trip length and trip type, which factor into the calculation of the project's VMT. The VMT Calculator was set up with the Project's land use program and the respective sizes as the primary input. The Project-generated VMT is compared with the average household VMT and the average work VMT per employee for the Area Planning Commission (APC) in which the Project is located. The Project Site is located in the South Los Angeles APC, which has a daily household VMT per capita of 6.0 and a daily work VMT per employee of 11.6.

The Project does not include residential uses and therefore, only the Work VMT was calculated. Based on the VMT Calculator, the Project is estimated to generate a daily VMT of 1,070. The Project is expected to generate work VMT per employee of 11.5. The work VMT per capita of 11.5 is less than the South Los Angeles APC impact threshold of 11.6. Therefore, the Project would not result in a significant work VMT impact. Because the Project would not result in a significant

household or work VMT impact, traffic mitigation measures are not required. (Detailed output from the VMT Calculator is provided in the Supplemental Memorandum).

The TIS includes an analysis of LOS at 10 study intersections, using the previous LOS methodology. This analysis is provided for informational purposes. The following 10 study intersections were evaluated:

1. Vermont Avenue and I-10 Westbound Ramps
2. Vermont Avenue and I-10 Eastbound ramps
3. Vermont Avenue and Adams Boulevard
4. Vermont Avenue and Jefferson Boulevard
5. Figueroa Street and Jefferson Boulevard
6. Vermont Avenue and 36th Place
7. Vermont Avenue and Exposition Boulevard
8. Figueroa Street and Exposition boulevard/37th Street
9. Flower Street/I-110 Southbound Off-Ramp and Exposition Boulevard
10. Hope Street/I-110 Northbound Off-Ramp and 37th Street

The TIS estimates that the Project, after accounting for trip adjustments, would generate 1,261 trips on a typical weekday, including 68 morning peak hour trips (41 inbound, 27 outbound) and 93 afternoon peak hour trips (47 inbound, 46 outbound).[93]

Based on the LOS analysis, **Table 4**, *Existing With Project Conditions (Year 2019)*, summarizes the weekday morning and afternoon peak hour Level of Service (LOS) for the 10 study intersections. As shown in Table 4, with the addition of Project-generated traffic, eight of the 10 study intersections are expected to operate at LOS D or better during both the morning and afternoon peak hours under Existing with Project Conditions. The remaining two intersections operate at LOS E or F during the morning peak or afternoon peak hour. The incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 10 study intersections. Thus, the Project would not result in a significant LOS impact at the study intersections during the morning and afternoon peak hours under Existing with Project Conditions (Year 2019).

TABLE 4
EXISTING WITH PROJECT CONDITIONS (YEAR 2019)

			Existing		Existing with Project			
No.	**Intersection**	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**Change in V/C**	**Significant Impact**
1.		AM	0.729	C	0.730	C	0.001	No

[93] *For detail regarding the trip generation, please see Table 8 of the TIS, which is provided as Appendix A of this memorandum.*

No.	Intersection	Peak Hour	Existing V/C	Existing LOS	Existing with Project V/C	Existing with Project LOS	Change in V/C	Significant Impact
	Vermont Avenue & I-10 Westbound Ramps	PM	0.593	A	0.593	A	0.000	No
2.	Vermont Avenue & I-10 Eastbound Ramps	AM	0.734	C	0.735	C	0.001	No
		PM	0.828	D	0.829	D	0.001	No
3.	Vermont Avenue & Adams Boulevard	AM	0.800	D	0.804	D	0.002	No
		PM	0.810	D	0.813	D	0.003	No
4.	Vermont Avenue & Jefferson Boulevard	AM	0.862	D	0.871	D	0.009	No
		PM	0.778	C	0.788	C	0.010	No
5.	Figueroa Street & Jefferson Boulevard	AM	0.864	D	0.864	D	0.000	No
		PM	0.793	C	0.795	C	0.002	No
6.	Vermont Avenue & 36th Place	AM	0.560	A	0.569	A	0.009	No
		PM	0.593	A	0.615	B	0.022	No
7.	Vermont Avenue & Exposition Boulevard	AM	0.911	E	0.920	E	0.009	No
		PM	0.780	C	0.786	C	0.006	No
8.	Figueroa Street & Exposition Boulevard/37th Street	AM	0.931	E	0.931	E	0.000	No
		PM	0.779	C	0.781	C	0.002	No
9.	Flower Street/I-110 Southbound Off-Ramp & Exposition Boulevard	AM	0.401	A	0.403	A	0.002	No
		PM	0.243	A	0.246	A	0.003	No
10.	Hope Street/I-110 Northbound Off-Ramp & 37th Street	AM	0.601	B	0.605	B	0.004	No
		PM	0.374	A	0.381	A	0.007	No

SOURCE: Gibson Transportation Consulting, Inc., 2019.

Table 5, *Future With Project Conditions (Year 2023)*, summarizes the future weekday morning and afternoon peak hour LOS for the 10 study intersections. As shown in Table 5, under Future With Project Conditions four of the 10 study intersections would operate at LOS D or better during both the morning and afternoon peak hours. The remaining six intersections are anticipated to operate at LOS E or F during at least one of the analyzed peak hours. The incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 10 study intersections. Therefore, the Project would not result in a significant LOS impact at the study intersections during the morning and afternoon peak hours under Future with Project Conditions (Year 2023).

TABLE 5
FUTURE WITH PROJECT CONDITIONS (YEAR 2023)

			Future Without Project		Future with Project			
No.	**Intersection**	**Peak Hour**	**V/C**	**LOS**	**V/C**	**LOS**	**Change in V/C**	**Significant Impact**
1.	Vermont Avenue & I-10 Westbound Ramps	AM	0.870	D	0.870	D	0.000	No
		PM	0.799	C	0.800	C	0.001	No
2.	Vermont Avenue & I-10 Eastbound Ramps	AM	0.894	D	0.894	D	0.000	No
		PM	1.013	F	1.014	F	0.001	No
3.	Vermont Avenue & Adams Boulevard	AM	0.992	E	0.994	E	0.002	No
		PM	1.016	F	1.024	F	0.008	No
4.	Vermont Avenue & Jefferson Boulevard	AM	0.930	E	0.939	E	0.009	No
		PM	0.846	D	0.856	D	0.010	No
5.	Figueroa Street & Jefferson Boulevard	AM	0.933	E	0.933	E	0.000	No
		PM	0.869	D	0.870	D	0.001	No
6.	Vermont Avenue & 36th Place	AM	0.597	A	0.606	B	0.009	No
		PM	0.626	B	0.648	B	0.022	No
7.	Vermont Avenue & Exposition Boulevard	AM	0.992	E	1.001	F	0.009	No
		PM	0.862	D	0.868	D	0.006	No
8.	Figueroa Street & Exposition Boulevard/37th Street	AM	1.001	F	1.002	F	0.001	No
		PM	0.894	D	0.897	D	0.003	No
9.	Flower Street/I-110 Southbound Off-Ramp & Exposition Boulevard	AM	0.451	A	0.454	A	0.003	No
		PM	0.312	A	0.315	A	0.003	No
10.	Hope Street/I-110 Northbound Off-Ramp & 37th Street	AM	0.673	B	0.675	B	0.002	No
		PM	0.480	A	0.487	A	0.007	No

SOURCE: Gibson Transportation Consulting, Inc., 2019.

Chapter 7 of the TIS provides a regional transportation analysis. The Project is projected to add seven peak hour trips during the morning peak hour and 10 peak hour trips during the afternoon peak hour at the CMP identified arterial monitoring intersection at Western Avenue and 9th Street, approximately 3.6 miles north of the Project Site, outside of the Study Area. Since the Project would not add more than 50 peak hour trips to the arterial monitoring intersection, no further analysis is required. Impacts would be less than significant.

With regard to freeway mainline segment analysis, the Project would add four peak hour trips during the morning peak hour and five peak hour trips during the afternoon peak hour at the CMP identified mainline freeway monitoring location within the vicinity of the Study Area at I-10 at Budlong Avenue, approximately 1.6 miles north of the Project Site. Since the Project would not add 150 trips in either direction during the peak hours, no additional freeway analysis is required under the CMP criteria for existing or future conditions. Impacts would be less than significant.

b) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Project would not result in any changes in the street design in the surrounding area. The Project, which is infill development, would locate a mixed use commercial building in an urban area. Access to the Project's subterranean parking garage and hotel valet loading area would be provided via one driveway on Vermont Avenue that would accommodate right-turn-only ingress and egress movements. The loading dock and trash facilities would be located in the parking garage on the ground floor. The Project driveway would be designed to minimize queuing on the adjacent street system that would block through traffic. The driveway would comply with LADOT standards. Adequate area would be provided within the parking garage to accommodate the vehicle and truck turning maneuvers.

Based on the TIS, the Project would provide a circulation plan that would accommodate vehicular traffic without impeding through traffic movements on City streets. Thus, impacts arising from hazards created by a Project design feature or incompatible Project uses would not occur.

c) Result in inadequate emergency access?

As indicated above, the Project would not result in traffic impacts during construction. In addition, PDF TR-1 requires the implementation of a Construction Management Plan that would: maintain emergency access to the Project Site through marked emergency access points approved by the City and provide for flagmen to facilitate traffic flow if there are partial closures to streets surrounding the Project Site. Construction impacts are temporary in nature and do not cause lasting effects to the provision of emergency access. In addition, the site plan would be reviewed by the City to ensure adequate emergency access during operation. Therefore, impacts regarding emergency access would be less than significant.

3.16.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant transportation impacts beyond those already identified in the Certified EIR.

3.16.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to transportation impacts. No substantial changes in the environment related to transportation have occurred since certification of the EIR, and no substantial new significant traffic sources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts related to transportation.

3.16.5 Mitigation Measures Addressing Impacts

None required.

3.16.6 Conclusion

Based on the above, no new significant transportation impacts or a substantial increase in previously identified transportation impacts would occur as a result of the Project. Therefore, the impacts to transportation as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.17 Tribal Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance	EIR's Mitigation Measures Addressing Impact
TRIBAL CULTURAL RESOURCES: Would the project:					
(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, please, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant with Mitigation	No	No	No	No
(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less Than Significant with Mitigation	No	No	No	Yes

3.17.1 Impact Determination in the EIR

AB 52 went into effect on July 1, 2015, and requires that for a project for which a Notice of Preparation (NOP) for a Draft EIR was filed on or after July 1, 2015, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe

requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project.

AB 52 also required an update to Appendix G of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. The Final EIR was released in May of 2018, and therefore did not include responses to the updated Appendix G questions related to tribal cultural resources.

Nevertheless, the issues related to tribal cultural resources were addressed within Section 4.3, Cultural Resources, of the Draft EIR. As stated in the Certified EIR, the Plan Area is highly urbanized and has been heavily disturbed and developed. Unmarked cemeteries or graves have likely been disturbed by past development. Given the Mission-associated Native American history of the Los Angeles Basin, and the practice to bury people outside Mission grounds in informal cemeteries, the potential to unearth human remains during excavation and grading activities exists. However, in accordance with California Health and Safety Code Section 7050.5, if any human remains are encountered during construction, the City will require that work in the immediate area of the find be halted and the Los Angeles County Coroner be contacted. It was found that no further disturbance will occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition. If the remains are determined to be those of a Native American, the Native American Heritage Commission in Sacramento shall be contacted before the remains are removed in accordance with PRC Section 21083.2. Mitigation Measures CR1 and CR2 would reduce impacts to tribal cultural resources. Therefore, with implementation of Mitigation Measures CR1 and CR2, the Certified EIR determined that implementation of the Plan would result in a less than significant impact related to tribal cultural resources.

Mitigation Measures

CR1 Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that if during construction activities any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately and the project applicant shall notify the City. A qualified archeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site. If the find were determined to be significant by the archeologist, the City and the archeologist would meet to determine the appropriate course of action. All cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

CR2 Any approval of a project within a CPIO Subarea (excluding Residential Subareas M, N, and O) that involves construction-related soil disturbance shall require that during excavation and grading, if paleontological resources are uncovered, all work in that area shall be halted immediately and the project applicant shall notify the City. The project applicant

shall retain a paleontologist to assess the nature, extent, and significance of any cultural materials that are encountered and to recommend appropriate methods to preserve any such resources. Said paleontologist will have the authority to put a hold on grading operations and mark, collect and evaluate any paleontological resources found on the site where it is discovered during construction. Said paleontologist shall be provided a reasonable amount of time to prepare and implement protection measures coordinating with the City of Los Angeles Building and Safety Department. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.

3.17.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project would be located in an urbanized area on a Site that has been previously developed. While unlikely, it is possible that unknown tribal cultural resources could exist at the Project Site and could be encountered during excavation for the proposed subterranean parking levels. Therefore, the Project would implement Mitigation Measures CR1 and CR2, which would minimize impacts in the event any tribal cultural resources are encountered during construction. Further, the City has established a standard condition of approval to address the inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting of construction activities near the encounter and the Project's certified construction monitor notifying the City and Native American tribes that have informed the City that they are traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. Therefore, the 10011 Washington Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

Mitigation Measures

The Project would implement Mitigation Measures CR1 and CR2 from the Certified EIR.

3.17.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant impacts with respect to tribal cultural resources beyond those already identified in the Certified EIR.

3.17.4 Any New Information of Substantial Importance?

There is no new information of substantial importance which has become available relative to tribal cultural resources that would result in new or more severe significant environmental impacts.

3.17.5 Mitigation Measures Addressing Impacts

As stated above, the Project would implement Mitigation Measures CR1 and CR2 from the Certified EIR. Implementation of these measures would ensure that the Project's impacts with respect to tribal cultural resources are less than significant. No additional mitigation measures are required.

3.17.6 Conclusion

Based on the above, no new significant tribal cultural resources or a substantial increase in previously identified tribal cultural resources would occur as a result of the Project. Therefore, the impacts to tribal cultural resources as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.18 Utilities and Service Systems

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(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 or expansion of existing facilities, the construction of which could cause significant environment effects?	Less Than Significant	No	No	No	No
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No	No	No	No
(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	No	No	No	No
(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	No	No	No	No
(e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

3.18.1 Impact Determination in the EIR

Mitigation Measures

Impacts with respect to utilities and service systems were determined to be less than significant. Therefore, no mitigation measures were required.

3.18.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project would be located in an existing highly urban area served by existing public utilities and services. A considerable increase in demand for services or utilities would not be anticipated with the implementation of the Project since it is located on an existing urban infill location previously developed with a library. The City of Los Angeles Department of Water and Power provides water and electricity to the Project Site. With regard to water, LADWP supplies water for approximately 3.9 million residents and businesses and 676,000 customers each year.[94] Consistent with the California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610-10656), which addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies, the City has an adopted Urban Water Management Plan (UWMP), which is updated every five years. LADWP adopted the 2015 UWMP on April 27, 2016, which addresses short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. (The next UWMP update is planned for 2020.) The City has a number of applicable plans and requirements regarding water conservation, including Sustainable City pLAn, which was first released in April 2015, and has been updated in 2019 as the City's Green New Deal, Water Efficiency Requirements Ordinance (Ordinance No. 180,822), the City's Green Building Code, and the Landscape Ordinance (Ordinance No. 170,978).

The Project is located within the South Community Plan area and would be consistent in terms of use and intensity of development that is allowed on the Project Site. The Project would comply with all applicable requirements regarding water conservation. As indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, the increase in water demand that would occur over time in accordance with the Community Plans is within the UWMP's projected water supplies for normal, single-dry, and multiple-dry years through 2035, and falls within the UWMP's 25-year water demand growth projection. As discussed in the water reliability section of the 2015 UWMP, LADWP expects to have a reliable supply of up to 675,700 acre-feet of water in 2040 and as shown in the UWMP, LADWP will be able to maintain reliability under the driest three-year sequence.[95] In addition, the City's policy is that future water needs shall be met by expanding water recycling and conservation. Therefore, with compliance with applicable requirements impacts regarding water supply would be less than significant.

With regard to water infrastructure, the Project would connect to the existing water lines. As indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, the City requires that applicants coordinate with the LADWP in order to ensure that existing and/or planned water conveyance facilities are capable of meeting water demand/pressure requirements. While no improvements to the existing water lines are anticipated, if improvements were to be needed as indicated in the South Los Angeles and Southeast Los Angeles Community Plans EIR, no significant environmental impacts would be necessary. Therefore, the Project would

[94] *City of Los Angeles, South Los Angeles and Southeast Los Angeles Community Plans Draft EIR, 2017.*

[95] *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, page ES-23 and 24.*

not require the construction or expansion of water treatment facilities that would cause significant environmental effects. In terms of water supply, the Project would comply with applicable water conservation measures as required by the City. The Project is consistent in terms of use and intensity of development with the General Plan designation and zoning on the property and therefore, has been included in the City's water projections. In addition, the City's policy is that future water needs shall be met by expanding water recycling and conservation. Therefore, the Project would not result in the need for new or expanded entitlements.

With regard to wastewater, the Project would comply with water conservation policies and applicable wastewater regulations, which would be verified during the permit and approval process. Based on Figure 4.16-1 of the South Los Angeles and Southeast Los Angeles Community Plans EIR, the Project Site is not located within an area of constrained sewer capacity.[96] In addition, using the City generation rates for wastewater that are provided in the City-prepared Sewer Capacity Availability Request (SCAR), the Project would generate 22,760 gallons per day of wastewater.[97] As indicated in the City's will serve letter, there is sufficient capacity in the lines in the Project area to accommodate the anticipated discharge from the Project.[98] In terms of treatment capacity, the South Los Angeles and Southeast Los Angeles Community Plans EIR evaluated the wastewater treatment capacity and determined that the treatment plants have ample capacity to accommodate the projected growth within the Plans' areas. Therefore, the Project would not require the construction or expansion of wastewater treatment facilities.

As described in the Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2016 Annual Report, future disposal needs over the next 15-year planning horizon (2031) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. Upon buildout, the Project would require the addition of a solid waste collection route for weekly service by LA Sanitation (i.e., private haulers under contract to LA Sanitation), and would be required to provide a minimum of two months' advance notice to LA Sanitation to allow for integration into the weekly collection schedule. The Project would not require the expansion or construction of a new solid waste disposal or recycling facility to handle Project-generated waste because the existing facilities have enough capacity to receive the Project's waste.

SoCal gas provides natural gas services to the City of Los Angeles and would be expected to serve the Project. Thus, the Project meets this criterion.

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[96] *City of Los Angeles, South Los Angeles and Southeast Los Angeles Community Plans Draft EIR (2017), Figure 4.16-1, page 4.16-24.*

[97] *Sewer Capacity Availability Request (SCAR), November 6, 2019.*

[98] *City of Los Angeles Bureau of Engineering will serve letter dated November 7, 2019.*

Mitigation Measures

None required.

3.18.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant utilities impacts beyond those already identified in the Certified EIR.

3.18.4 Any New Information of Substantial Importance?

There is no new information of substantial importance that has become available relative to utilities impacts. No substantial changes in the environment related to recreation have occurred since certification of the EIR, and no substantial new significant resources have been identified within the vicinity of the Project that would result in new or more severe significant environmental impacts related to utilities.

3.18.5 Mitigation Measures Addressing Impacts

Because the Certified EIR determined the Project would have a less than significant impact with respect to utilities and services systems, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.18.6 Conclusion

Based on the above, no new significant utility and service system impacts or a substantial increase in previously identified utility impacts would occur as a result of the Project. Therefore, the impacts to utilities and service systems as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.

3.19 Wildfire

Issues (and supporting Information Sources)	Impact Determination in EIR	Any Substantial Changes Involving New Significant Impacts or Substantially More Severe Impacts?	Any Substantially Changed Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	EIR's Mitigation Measures Addressing Impact
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	No	No	No	No
(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?	Less Than Significant	No	No	No	No
(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?	Less Than Significant	No	No	No	No
(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 change?	Less Than Significant	No	No	No	No

3.19.1 Impact Determination in the EIR

The Certified EIR determined that the Plan Area is located in a highly-urbanized portion of the City of Los Angeles and is not located in an area identified as a wildland fire hazard area according to Exhibit D, Selected Wildfire Hazard Areas of the Safety Element. Therefore, the Certified EIR concluded that implementation of the Plan would result in less than significant impacts related to wildland fire.

3.19.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Project Site is not located in or near state responsibility areas, nor is the Project Site classified as a Very High Fire Hazard Severity Zone. Therefore, the Project would result in no impact related to wildfire. Therefore, the Project would not result in new or increased significant impacts beyond those already identified in the Certified EIR.

3.19.3 Any Substantial Changes to the Project or Substantial Changes in Circumstances Involving New Significant Impacts or a Substantial Increase in the Severity of Significant Impacts?

The Project would not result in new or increased significant wildfire impacts.

3.19.4 Any New Information of Substantial Importance?

There is no new information of substantial importance which has become available relative to wildfire that would result in new or more severe significant environmental impacts.

3.19.5 Mitigation Measures Addressing Impacts

Because the EIR determined the Project would have a less than significant impact on wildfire, no mitigation measures were required. Implementation of the Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

3.19.6 Conclusion

Based on the above, no new significant wildfire impacts or a substantial increase in previously identified wildfire impacts would occur as a result of the Project. Therefore, the impacts to wildfire as a result do not meet the standards for a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162.