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

SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

6728 Sepulveda Boulevard Project

Case Number: ENV-2022-5108-SCEA

Project Location: 6728 Sepulveda Boulevard, 6715 Columbus Avenue, Los Angeles 91411

Community Plan Area: Van Nuys-North Sherman Oaks

Council District: 6—District Office

Project Description: The Project consists of the construction of a 268,770 square-foot, 405 unit (including 41 affordable housing units, which is 10 percent of the total Project units) residential development comprised of a six-story structure with three subterranean parking levels with a maximum height of 66 feet. The 94,951 square foot Project Site is currently vacant. The Project would incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies. The Project would provide 556 total vehicular parking spaces and 194 bicycle parking spaces (176 long-term and 18 short-term.) Upon completion, the Project would have a maximum floor area ratio (FAR) of 3.18:1. In order to permit development of the Project, the City would require approval of the following discretionary actions: (1) Transit Oriented Communities (TOC) Tier 3 Project with three base incentives, which allows a 70 percent bonus density, a 50 percent FAR bonus, and reduced required parking and two additional incentives including a 25 precent reduction in required open space and an increase of 22 feet in height; (2) Site Plan Review; and (3) other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation/shoring permits, building permits, and sign permits in order to execute and implement the Project.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra Consulting, Inc.

APPLICANT:

Uncommon Developers

June 2023

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1 INTRODUCTION

An application for the proposed 6728 Sepulveda Boulevard Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of a Sustainable Communities Environmental Assessment (SCEA) is required.

This SCEA evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This SCEA has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this SCEA, the City has concluded that the Project qualifies as a Transit Priority Project (TPP), is consistent with an adopted Sustainable Communities Strategy (SCS) that has been accepted by the California Air Resources Board (CARB) as meeting the State's greenhouse gas (GHG) reduction targets, and that the Project would not result in significant impacts on the environment. This SCEA is intended as an informational document, which is ultimately required to be considered and adopted by the decision-making body of the City in conjunction with approval of the Project.

1.1 PURPOSE

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

Public Resources Code Section 21155.2(b)(1) requires that an Initial Study be prepared for each SCEA. An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If a qualifying project meets certain criteria described below and the Initial Study shows that any potential significant effects would be avoided or mitigated to a point where clearly no significant effects would occur through project mitigation measures, a SCEA may be prepared. If it is determined in the Initial Study that there is substantial evidence, in light of the whole record before

the agency, that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) is normally required.[1]

1.1.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, also known as the "Sustainable Communities and Climate Protection Act of 2008", which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's GHG emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations to incorporate an SCS into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. The SCEA is one of these streamlining tools.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG's Regional Council adopted Resolution 20-624-1, which approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG's resolution adopting the 2020–2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020–2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB "accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels."

SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for TPPs, as described below, that are consistent with the 2020–2045 RTP/SCS.

1.1.2 Purpose and Content of a SCEA

The purpose of a SCEA is to evaluate the environmental effects of a project in accordance with CEQA and PRC Sections 21155 and 21155.2. In addition, a SCEA must evaluate a project's consistency with SCAG's RTP/SCS and incorporates feasible mitigation measures, performance standards, and/or criteria from prior applicable EIRs into the proposed project.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain TPPs. TPPs are residential or mixed-use residential projects that

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

provide a minimum net density of 20 dwelling units per acre and are located within one-half mile of a major transit stop or high-quality transit corridor (Public Resources Code Section 21155(b)). The intent of the CEQA streamlining provisions is to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce GHG emissions by integrating transportation and land use planning.

A SCEA is comparable to a Mitigated Negative Declaration (MND) in that the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a less than significant level. A SCEA must also identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be considered cumulatively considerable. Unlike an MND, a SCEA must incorporate all feasible mitigation measures from prior and applicable EIRs into the project prior to conducting the Initial Study analysis. Also, a SCEA is not required to reference, describe, or discuss growth-inducing impacts and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network.

A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA. The lead agency's decision to review and approve a project with a SCEA shall be reviewed under the substantial evidence standard.

1.2 ORGANIZATION OF THE SCEA

This SCEA is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the SCEA and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

The SCEA Criteria and Consistency Analysis demonstrates that the Project qualifies as a Transit Priority Project and is consistent with the Sustainable Communities Strategy.

5 EVALUATION OF ENVIRONMENTAL IMPACTS

The Evaluation of Environmental Impacts contains the completed Initial Study Checklist and the environmental factors that would be potentially affected by the Project. The Initial Study Checklist includes existing mitigation measures from the RTP/SCS and any other relevant plans and demonstrates why they have or have not been incorporated into the Project.

6 MITIGATION MONITORING PROGRAM

Outlines the implementation of the Project's mitigation measures and project design features and identifies enforcement and monitoring agencies responsibilities.

7 APPENDICES

Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the City of Los Angeles Department of City Planning.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

The City has prepared this SCEA to determine if the Project qualifies as a TPP, is consistent with the SCS, and if it may have a significant effect on the environment. This SCEA determined that the Project meets the criteria for a SCEA and would not have a significant effect on the environment. A Notice of Completion and Availability (NOC/NOA) is circulated to notify public agencies and the general public that a draft of the SCEA is available for review and comment for a period of at least 30 days. CEQA requires that the legislative body (i.e., City Council) or planning commission of the lead agency conduct a public hearing and consider all comments received prior to acting on the SCEA. The lead agency may then adopt the SCEA, provided it finds the following:

a. All potentially significant or significant effects required to be identified in the Initial Study have been identified and analyzed, and

b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

    i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

    ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**6728 Sepulveda Boulevard Project**
ENVIRONMENTAL CASE NO.	ENV-2022-5108-SCEA
RELATED CASES	None

PROJECT LOCATION	**6728 Sepulveda Boulevard, 6715 Columbus Avenue, Los Angeles, California, 91411**
COMMUNITY PLAN AREA	Van Nuys-North Sherman Oaks
GENERAL PLAN DESIGNATION	General Commercial
ZONING	[Q]R4-1-RIO
COUNCIL DISTRICT	District 6

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Trevor Martin
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APPLICANT	**Uncommon Developers**
ADDRESS	9220 Winnetka Avenue, Chatsworth, CA 91311
PHONE NUMBER	(310) 980-7208

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Trevor Martin, City Planning Associate	June 14, 2023
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project consists of the construction of a 268,770 square-foot, 405 unit (including 41 affordable housing units, which is 10 percent of the total Project units) residential development comprised of a six-story structure with three subterranean parking levels with a maximum height of 66 feet. The 94,951 square foot Project Site is currently vacant. The Project would incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies. The Project would provide 556 total vehicular parking spaces and 194 bicycle parking spaces (176 long-term and 18 short-term.) Upon completion, the Project would have a maximum floor area ratio (FAR) of 3.18:1. In order to permit development of the Project, the City would require approval of the following discretionary actions: (1) Transit Oriented Communities (TOC) Tier 3 Project with three base incentives, which allows a 70 percent bonus density, a 50 percent FAR bonus, and reduced required parking and two additional incentives including a 25 percent reduction in required open space and an increase of 22 feet in height; (2) Site Plan Review; and (3) other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation/shoring permits, building permits, and sign permits in order to execute and implement the Project.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located within the boundaries of the Van Nuys-North Sherman Oaks Community Plan, one of the 35 Community Plans which form the Land Use Element of the General Plan for the City of Los Angeles. The Project Site has been designated General Commercial under the Van Nuys-North Sherman Oaks Community Plan. The Project Site's location within the Van Nuys community of the City of Los Angeles is depicted in Figure 3.1, *Regional and Vicinity Map* and Figure 3.2*, Aerial View of the Project Site*. The Project Site is located at 6728 Sepulveda Boulevard and 6715 Columbus Avenue, and is bounded by Sepulveda Boulevard to the west, a retail shopping center to the north, Columbus Avenue to the west, and the Beverly Manor Convalescent Center to the south.

Regional access to the Project Site is provided by the San Diego Freeway (I-405), which runs in a north-south direction just to the west of the Project Site. The major arterials that provide regional and sub-regional access to the Project Site vicinity include Sepulveda Boulevard and Sherman Way. There are multiple transit options in the immediate area,

including, Metro bus stops for Metro Route 234, on the southwest and southeast corners of Vanowen Street and Sepulveda Boulevard, accommodating southbound travel and northbound travel, both approximately 500 feet northwest of the Site, and Metro bus stops for Metro Route 165, on the southwest and northwest corners of Vanowen Street and Sepulveda Boulevard, accommodating eastbound travel and westbound travel, both approximately 550 feet northwest of the Site. The Project Site is also located approximately 1.0 mile north of the Sepulveda Metro G Line (Orange) Station.

3.2.2 Existing Conditions

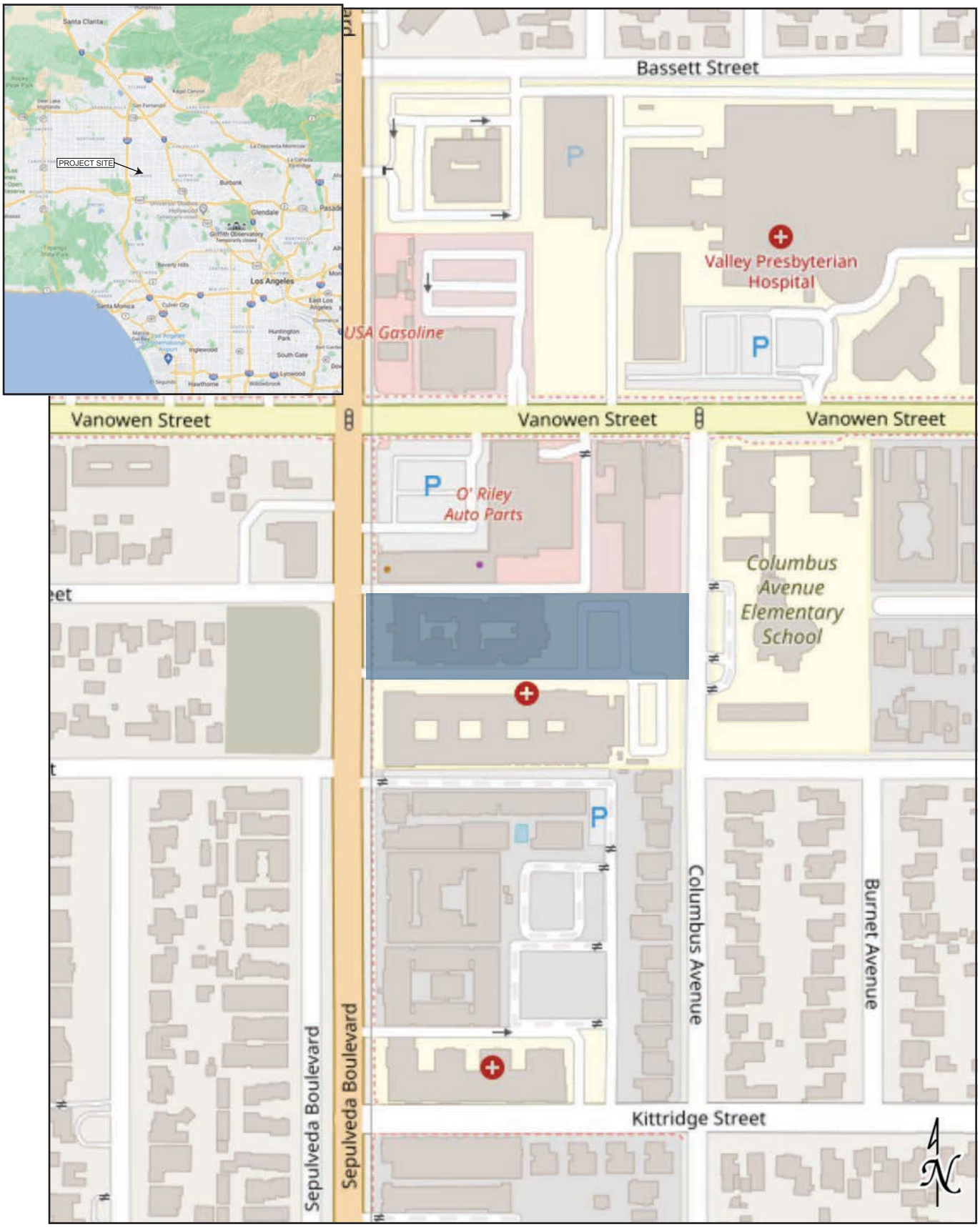
The Project Site is comprised of one parcel within Assessor Parcel Number (APN) 2235-004-010. The parcel is comprised of Lot 1 of Tract No. 24408. The Project Site is rectangular in shape and totals 94,951 square feet in area. As shown in Figure 3.3, *Existing Views of the Project Site,* the relatively flat Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half. The Project Site is overgrown with weeds and contains three (3) non-protected trees. Vehicular access was previously provided via a driveway along the southern property line accessed from Sepulveda Boulevard.

The Project Site has a General Plan land use designation of General Commercial, which has corresponding zones of C1.5, C2, C4, RAS3, and RAS4. The General Commercial land use designation permits a range of corresponding commercial and residential zones that allow for a variety of commercial and residential uses and intensities.

The Project Site is zoned [Q]R4-1-RIO (Multiple Dwelling, Height District 1, River Improvement Overlay). Per Ordinance No. 170,031, the [Q] condition changed the zoning designation from [Q]R5-1 to [Q]R4-1 and all development is subject to Condition Nos. 2 and 3 in Ordinance No. 143,733. Condition No. 2 prohibits vehicular access from Columbus Avenue and Condition No. 3 requires the landscaping setback area adjoining Columbus Avenue to be extended northerly to the north boundary of the Project Site.[2] Land uses allowed in the R4 Multiple Dwelling zone include a variety of community commercial uses (including churches, child care facilities, hotels, motels, schools, museums, libraries, and retirement hotels, etc.) as well as any residential land use allowed in the R3 zone (including multiple family dwellings) with a minimum lot area of 400 square feet per dwelling unit).[3] The Project Site is located in Height District No. 1, which permits a building height limitation of 45 feet and restricts the FAR to 3:1. The Project Site is also located within a River Implementation Overlay District (RIO), which enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries.

[2] City of Los Angeles, Ordinance No. 143,733, September 16, 1972, and Ordinance No. 170,031, November 2, 1994.

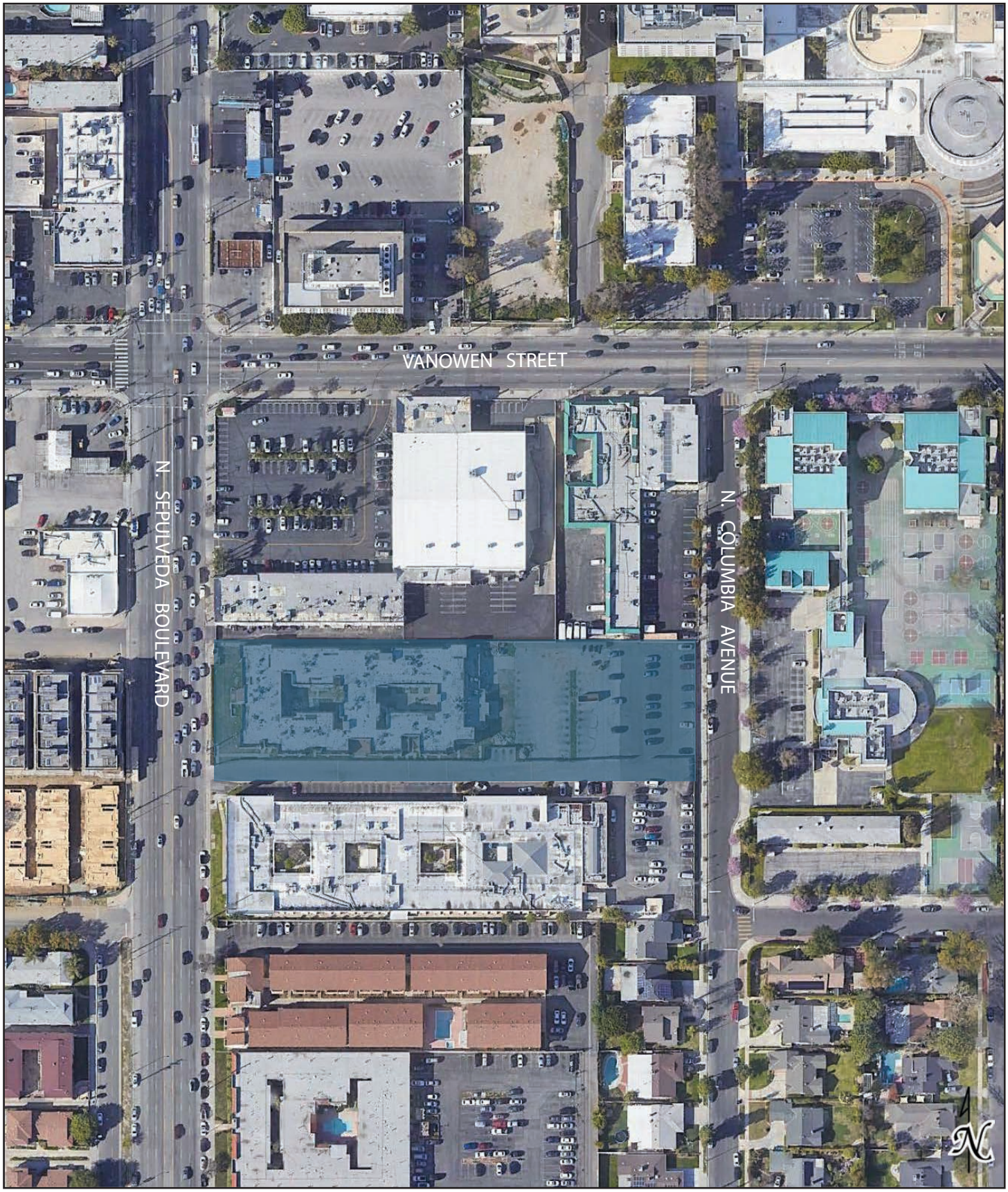
[3] LAMC Section 12.11.A.



Project Site

Source: OpenStreetMaps, September 2022.

Figure 3.1
Regional and Vicinity Map



Project Site

Source: Google Earth, September 2022.

Figure 3.2
Aerial View of the Project Site



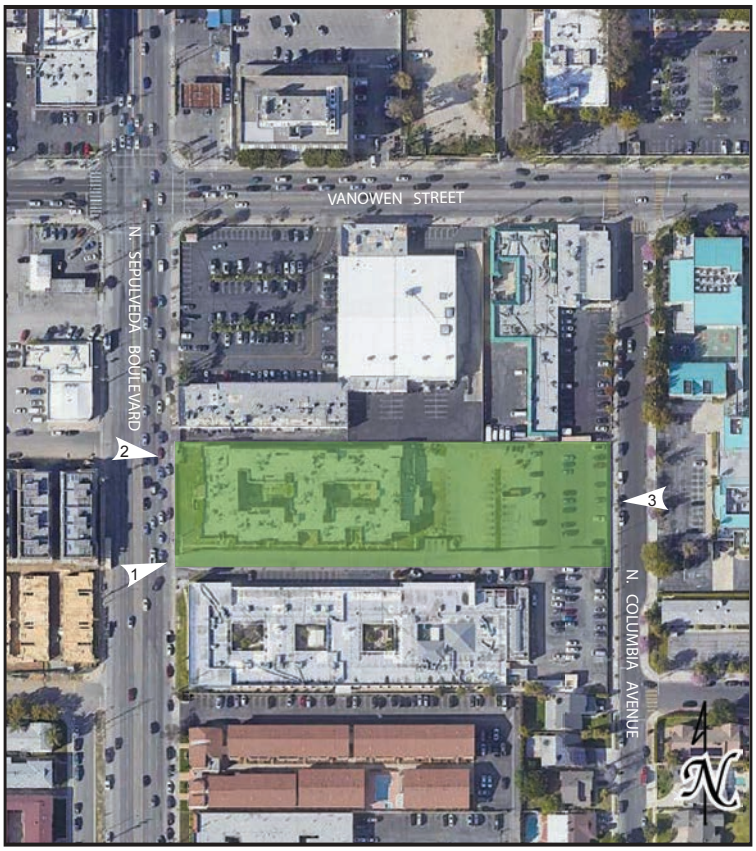
View 1: View looking northeast from N. Sepulveda Boulevard at the Project Site.



View 2: View looking east from N. Sepulveda Boulevard at the Project Site.



View 3: View looking west from N. Columbia Avenue at the Project Site.



PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, September 2022.

Figure 3.3
Existing Views of the Project Site
Views 1, 2, and 3

The Project Site is not located in a Historic Preservation Review or Overlay Zone. Further, the Project Site is not in a Hillside Area or subject to Hillside Construction Regulation and is not located in a Clean Up-Green Up (CUGU) area. The Project Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. The Project Site is not located within a Very High Fire Severity Zone, Flood Zone, Watercourse, Hazardous Waste zone, a High Wind Velocity zone, a Landslide area, Preliminary Fault Rupture Study Area, Methane Buffer Zone, or a Tsunami Inundation Zone; but the Project Site is located within a liquefaction zone. The Project Site is located 5.0 miles from the Northridge Fault and is not located within an Alquist-Priolo zone.[4]

The Project Site is not located within 500 feet of a park. However, the Project Site is located within 500 feet of a school (Columbus Avenue Elementary School is located approximately 200 feet east). The Project Site is located within 500 feet of an Airport Hazard area: Horizontal Surface Area, which is an area whose boundaries impose height limitations on the use of the land, due to its proximity to the Van Nuys Airport to the northwest. Fire protection service is provided by Fire Station 39, Battalion 10 of the Los Angeles Fire Department. Police services are provided by Reporting District 923, Van Nuys Division, Valley Bureau of the Los Angeles Police Department.[5]

Senate Bill (SB) 743 sets forth new guidelines for evaluating project transportation impacts under CEQA: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” ((Public Resources Code (PRC) § 21099(d).). A TPA is defined 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.” (PRC § 21099(a)(7).) A “major transit stop” is defined as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” (PRC § 21064.3.) An “employment center project” is defined 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 § 21099(a)(1).) “Infill Site” is defined 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.” (PRC § 21099(a)(4).) This State law supersedes the

[4] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

[5] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI 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 City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.

The Project Site is located within a TPA pursuant to SB 743, and a City-verified Tier 3 TOC Affordable Housing Incentive Program Area as the Project Site is within a 2,640-foot radius of a Major Transit Stop, the Metro bus stops for Metro Route 165, and the Metro Next Gen Rapid Bus Line 234, on the southwest and northwest corners of Vanowen Street and Sepulveda Boulevard, as defined in Public Resources Code Section 21064.3.[6] The City's Zoning Information File No. 2452 also identifies the Project Site as within a TPA.[7]

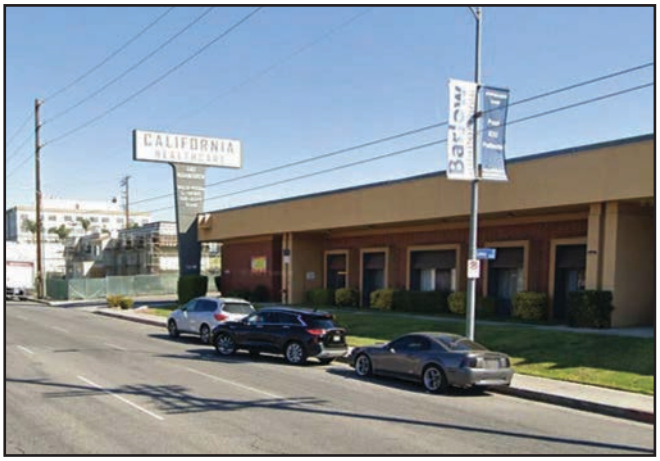
The City's Mobility Plan 2035 classifies Sepulveda Boulevard as a Boulevard II and Columbus Avenue as a Local Street.

3.2.3 Surrounding Land Uses

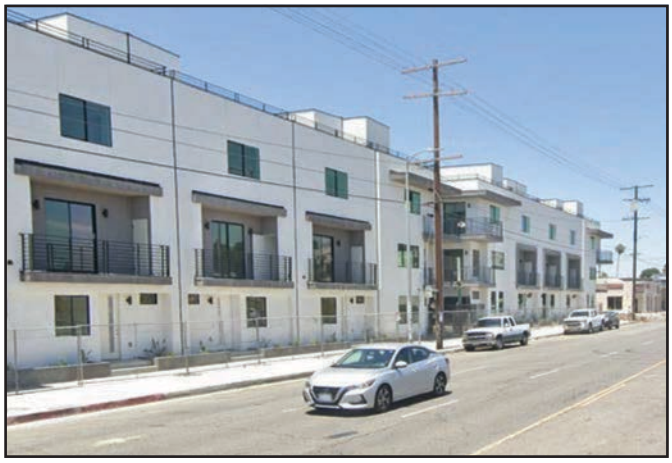
The Project Site is located within an urbanized setting in the Van Nuys community of the City of Los Angeles. Property in the surrounding area is characterized by a mix of low- and high-density neighborhoods, commercial uses, and a school. Specifically, the properties to the west, across Sepulveda Boulevard are zoned [Q]RD1.5-1-RIO and are improved with Midvale Village, comprised of three-story residential townhomes. The properties immediately to the north are zoned C2-1VL-RIO and are improved with one-story uses, including a commercial shopping center. The property to the east is zoned PF-1XL-RIO and is improved with the Columbus Avenue Elementary School. The property immediately to the south is zoned [Q]R4-1-RIO and is improved with the one-story Beverly Manor Convalescent Center. Refer to Figures 3.4 through 3.6*, Views of Surrounding Uses.*

[6] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022; and Department of City Planning Case Number PAR-2021-7889-TOC.

[7] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.



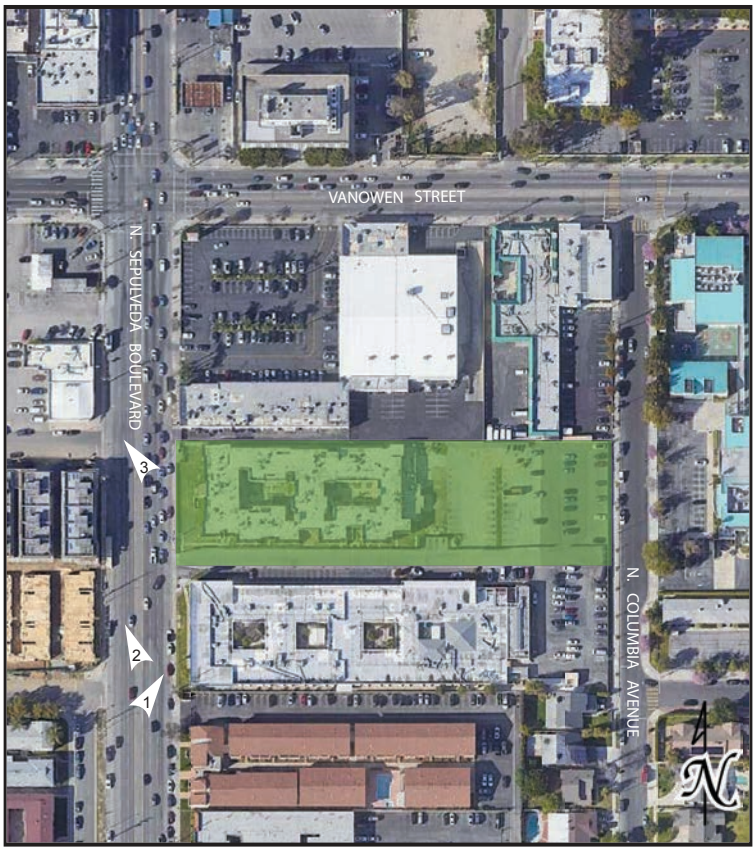
View 1: View looking northeast from N. Sepulveda Boulevard at the adjacent Beverly Manor Convalescent Center.



View 2: View looking west across N. Sepulveda Boulevard towards the residential Midvale Village.



View 3: View looking northwest across N. Sepulveda Boulevard at commercial uses.



PROJECT SITE

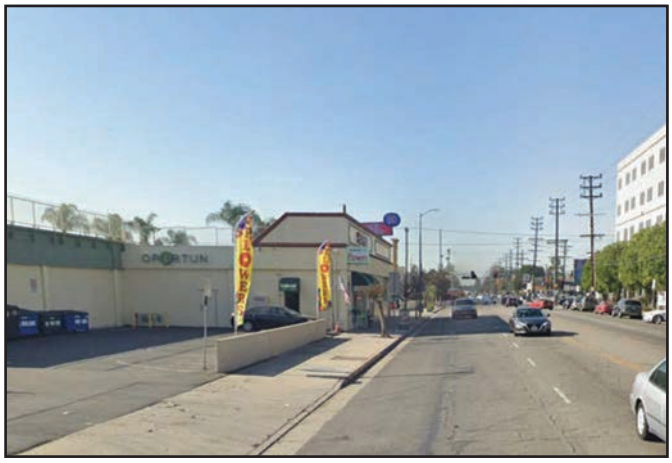
PHOTO LOCATION MAP

Source: GoogleEarth, September 2022.

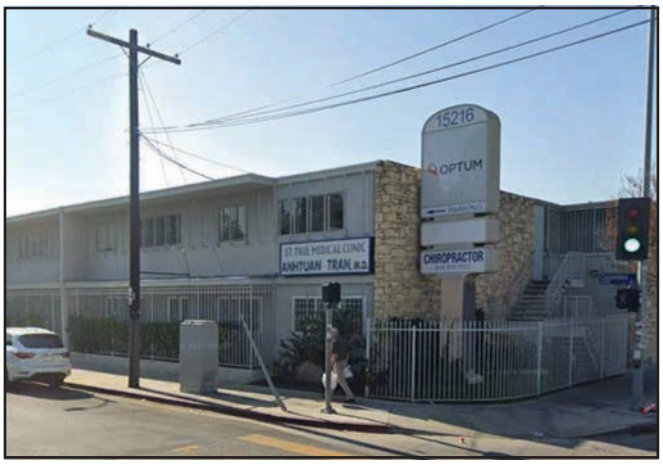
Figure 3.4
Views of Surrounding Uses
Views 1, 2, and 3



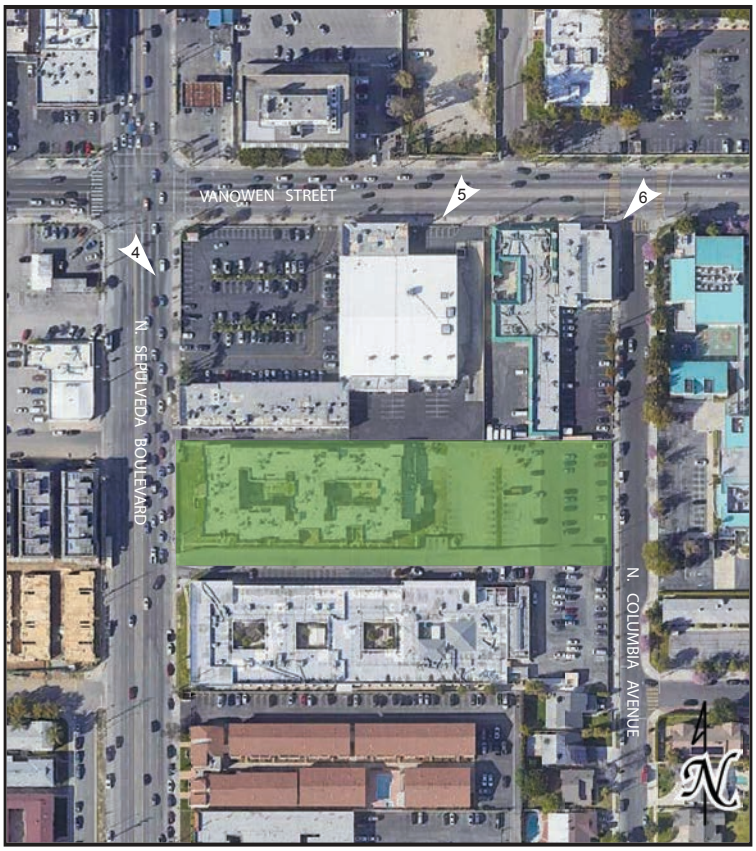
View 4: View looking southeast from N. Sepulveda Boulevard at the adjacent commercial shopping center.



View 5: View looking southwest from N. Vanowen Street towards commercial uses.



View 6: View looking southwest from N. Vanowen Street towards commercial uses.



PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, September 2022.

Figure 3.5
Views of Surrounding Uses
Views 4, 5, and 6



View 7: View looking northeast from N. Columbia Avenue at Columbus Avenue Elementary School.



View 8: View looking east from N. Columbia Avenue towards residential uses.



View 9: View looking southwest from N. Columbia Avenue towards the rear of the adjacent Beverly Manor Convalescent Center.

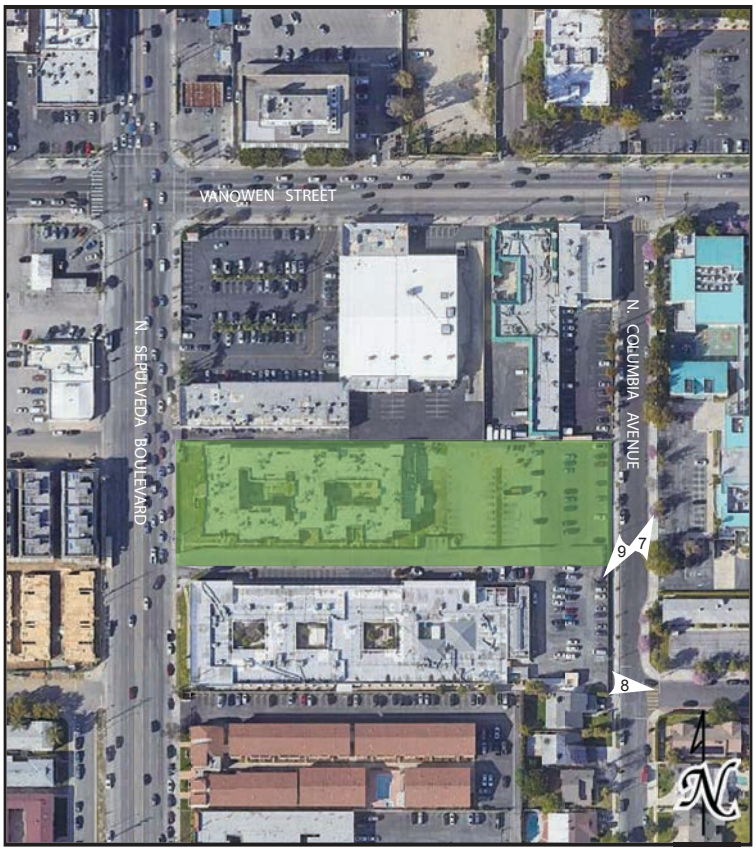


PHOTO LOCATION MAP

Source: GoogleEarth, September 2022.

Figure 3.6
Views of Surrounding Uses
Views 7, 8, and 9

3.3 DESCRIPTION OF PROJECT

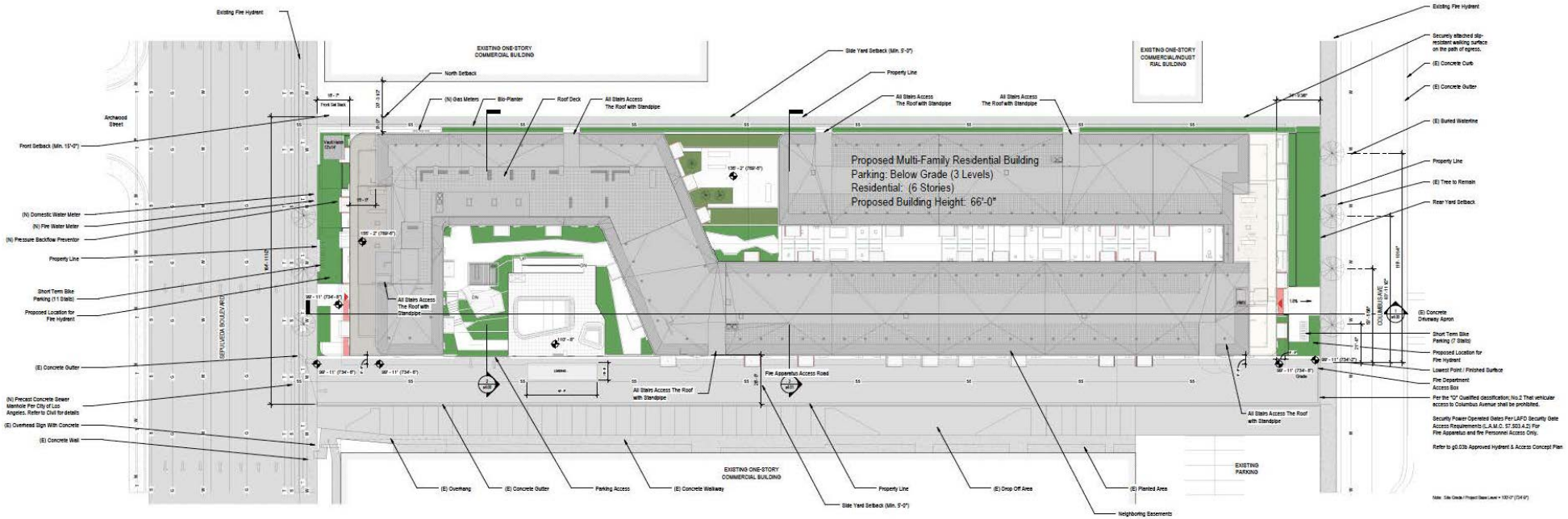
3.3.1 Project Overview

The Project consists of the construction of a 268,770 square-foot, 405 unit (including 41 affordable housing units, which is 10 percent of the total Project units) residential development on a vacant Project Site. The Project would be comprised of a six-story building, approximately 66 feet in height, above three levels of subterranean parking. Refer to Figure 3.6*, Site Plan*, and Table 3.1*, Project Development Summary,* for a summary of the Project.

Table 3.1
Project Development Summary

Land Use	Amount
Residential Units (du)	
Studio	94
One-Bedroom	195
Two-Bedroom	115
Three-Bedroom	1
Total Units	**405 du**
Parking Spaces	
Residential (Vehicle)	556
Total Vehicle Parking Spaces	**556**
Long-Term Residential (Bicycle)	176
Short-Term Residential (Bicycle)	18
Total Bicycle Parking Spaces	**194**
Open Space (sf)	
Common Open Space	
Gym	2,464 sf
Recreation Room	765 sf
Amenity/Lounge	3,591 sf
Pool Deck	9,924 sf
East Roof Terrace	736 ft
West Roof Terrace	733 ft
4th Level Roof Deck	1,815 sf
Roof Deck	5,288 sf
Subtotal Common Open Space	*25,316 sf*
Private Open Space	
Balconies	7,550 sf
Subtotal Private Open Space	*7,550 sf*
Total Open Space (sf)	**32,866 sf**

du = dwelling units; sf = square feet
Source: W.PA, February 2023.



Source: W.PA, February 2023.

Figure 3.7
Site Plan

3.3.1.1 Density

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.11 C.4, the permitted residential density in the R4 zone is one dwelling unit per 400 square feet of lot area. The Project Site has a total lot area of approximately 94,951 square feet which would allow a total of 238 units. With the provision of 10 percent of the total number of units, or 41 units, restricted as affordable for Extremely Low-Income households, the Project qualifies for a TOC base incentive to increase density by 70 percent for a total of 405 units.

3.3.1.2 Floor Area Ratio

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.21.1 A.1, the permitted floor area ratio (FAR) in the R4 zone in Height District 1 is 3.0 to 1. The Project Site has a lot area of approximately 94,951 square feet and a Buildable Area of approximately 84,547 square feet which would allow a total floor area of up to 253,641 square feet. The Project is requesting a TOC Tier 3 base incentive to allow an increase in FAR of up to 50 percent. With the base incentive, the Project would be permitted a FAR of 4.5:1 or 380,461 square feet. The Project includes 268,770 square feet of floor area resulting in an FAR of 3.18:1.

3.3.1.3 Height

The LAMC does not require a height or story limit for buildings in the R4 zone within Height District 1. The Van Nuys – North Sherman Oaks Community Plan Map designates the Project Site as General Commercial land use with Footnote 2. "Height District No. 1VL (three stories)." LAMC 12.21.1 A states that a building in Height District No. 1VL in the R4 zone is limited to 45 feet in height, but a building used entirely for residential purposes is not limited as to the number of stories. The Applicant is utilizing a TOC Tier 3 additional incentive to increase height by up to 22 feet which would allow a height of 67 feet. The Project proposes a total building height of 66 feet and 6 stories.

3.3.1.4 Setbacks

In the R4 zone, the required yard setbacks are as follows: front – 15 feet; side – five feet plus one foot for every story over two, or nine feet; rear – 15 feet plus one foot for every story over three or 18 feet. The Project includes the following yard setbacks: front – 18 feet 7 inches; side (north) – nine feet; side (south) – 28 feet; and rear – 18 feet. Therefore, the Project meets the yard setback requirements.

3.3.2 Design and Architecture

The Project's height, scale and massing has been designed to be compatible with surrounding existing development and consistent with the City's goals to place new high-density housing near transit options. The Project's contemporary architecture has been designed and configured to reflect the manner in which residents live and interact with their neighboring community. Each side of the building contains windows, architectural

vertical features, and balconies. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass. Specifically, the Project has been designed with regard to the adjacent elementary school and smaller scale commercial uses with a large break in massing on the southern façade and expansive open space areas. Furthermore, rooftop equipment would be set back from the roof parapet edge and appropriately screened from public view. Refer to Appendix A of this SCEA for conceptual site plans and elevations.

In accordance with the Citywide Design Guidelines, the building provides a variety of architectural materials and building planes while creating a pedestrian-scaled project at the street level with glass and varietal materials. The lobby area on the ground floor is finished with tint glass panels, aluminum storefront systems, and painted stucco, differentiating the lower façade from the podium levels and articulated balconies of the apartments above. The glass provides a change in material and additional transparency at the pedestrian level to promote public safety and to add interest for the ground-floor viewer. Those portions of the ground floor that are not composed of glass are wrapped with a wire mesh vine panels for vertical growing landscaping. Thereby, differentiating the lower level area from the upper floors which contain balconies and windows, providing articulation and breaks in plane. Furthermore, the Project has been carefully arranged to capture the linear form of the Site with a simple white and salmon pink stucco finish.

3.3.3 Open Space and Landscaping

The Project's required open space was calculated pursuant to LAMC Section 12.21.G, based on the size and number of dwelling units. As shown in the Table 3.1, *Project Development Summary*, the Project proposes 405 housing units. For each unit with less than three habitable rooms, 100 square feet of open space is required, for each unit with three habitable rooms, 125 square feet of open space is required, and for each unit with more than three habitable rooms, 175 square feet of open space is required. Thus, a total of 43,750 square feet of common open space is required for this Project. As a TOC additional incentive, the Project Applicant is requesting a 25 percent reduction in open space requirement, which reduces the requirement to 32,813 square feet. As also shown in Table 3.1, *Project Development Summary*, the Project would provide approximately 32,866 square feet of common open space. In addition, in conformance with LAMC Section 12.21.G, 25 percent of the provided exterior common open space would be landscaped, or a minimum of 4,624 square feet.

The Project would incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies. Specifically, the Project's first floor would include 2,464 square feet of gym area, a 1,909 square foot lounge area, a 765 square foot recreational

room, and 1,682 square feet of coworking/amenity space. The first floor would also include a 9,924 square foot pool deck area. The fourth floor would include an 1,815 square foot deck located on the central northern boundary of the Project Site. The sixth floor includes two separate roof terraces on the west and east ends of the Project, 733 square feet and 736 square feet, respectively. The roof would include a 5,288 square foot deck that would be landscaped and include seating areas.

The Project Site is overgrown with weeds and currently contains three (3) non-protected trees.[8] The Project would remove all existing non-native/non-protected trees on the Project Site. Refer to Appendix A of this SCEA for conceptual landscape plans.

3.3.4 Access, Circulation, and Parking

Pedestrian access to the Project would be provided from the west and east sides of the Project frontage from the sidewalks along Sepulveda Boulevard and Columbus Avenue.

Vehicular access to the Project Site would be provided via one driveway on Sepulveda Boulevard with additional access for emergency purposes only from Columbus Avenue. Pursuant to the LAMC 12.21.4, the Project would be required to provide 624 vehicular parking spaces. However, with application of the TOC base incentive for reduced parking, vehicular parking would be reduced to 203 vehicular parking spaces. As shown on Table 3.1*, Project Development Summary,* the Project would include 556 vehicular parking spaces, which would meet and exceed the number of required vehicular parking spaces. Parking would be provided in three subterranean levels and ground level parking that would be buffered by the residential lobby and amenity uses from Sepulveda Boulevard. The Project would also include immediate installation of Electric Vehicle (EV) charging stations for 11.3 percent of the total code-required parking spaces and wiring for future installation of EV charging stations for 18.7 percent of the total code-required parking spaces.

The Project is designed to minimize the visual impact of trash receptacles and loading areas. These areas are located within the Project and are not visible from surrounding public streets and public view.

The Project is required to provide 176 long-term bicycle parking spaces and 18 short-term bicycle parking spaces for the Project. As shown on Table 3.1*, Project Development Summary*, the Project meets this requirement with a total of 194 bicycle parking spaces (176 long-term and 18 short-term spaces). Bike parking spaces would be provided in the P1 level of the garage comprised of four bike rooms including a workspace. The 18 short-term bicycle parking spaces are proposed to be located along sidewalks and pedestrian walkways. Specifically, 11 short-term bicycle parking spaces would be located along the

[8] City of Los Angeles, Tree Disclosure Statement, June 27, 2022. Refer to Appendix B of this SCEA.

Project frontage on Sepulveda Boulevard and seven (7) short-term bicycle parking spaces would be located along the Project frontage on Columbus Avenue.

3.3.5 Lighting and Signage

New Project signage would be used for building identification, wayfinding, and security markings. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses in accordance with the LAMC. Lighting would include low-level exterior lights adjacent to buildings and along pathways for security and way-finding purposes. In addition, low-level lighting to accent architectural features and landscaping elements would also be incorporated throughout the Project Site. Proposed lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions, which would minimize light trespass from the proposed buildings and overall Project Site, reduce sky-glow to increase night sky access, and improve nighttime visibility through glare reduction.

3.3.6 Site Security

Given the residential uses on the Project Site, the Project would operate 24 hours per day. The Project would provide security features including, but not limited to, controlled access, alarm system, and video surveillance.

3.3.7 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen). These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project include, but would not be limited to the following:

- 30 percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles;
- Material recycling stations;
- Highly efficient HVAC systems;
- Air tight and insulated envelope;
- Low-E windows;
- Energy Star-labeled appliances;
- Low-water use plumbing fixtures;
- MERV 13 air filters;
- Low-water use landscaping; and
- Solar Photovoltaic systems.

In accordance with new CAL-Green requirements, the Project includes the required 15 percent of the total roof areas as solar-ready. The Project proposes 115 trees, including seven (7) street level trees, pending Urban Forestry Division approval. Overall, the proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water use (i.e. the use of native and low-water plants). Overall water consumption would be minimized with the inclusion of water efficient appliances and fixtures throughout the development.

The Project would support fewer vehicle trips by locating 405 new housing units (and approximately 911 new residents[9]) in a neighborhood that is served by several Metro bus lines, which run bus lines along Sepulveda Boulevard and Vanowen Street. The Project Site is also located within one-mile of the Sepulveda Metro G Line (Orange) Station.

3.3.8 Anticipated Construction Schedule

As shown in Table 3.2, *Construction Schedule*, the Project would be constructed in approximately 28 months beginning in third quarter of 2023 with occupancy projected for the fourth quarter of 2025. Construction activities would include the demolition of the existing surface parking area, grading, excavation, and building construction. The Project would require the net export of approximately 77,277 cubic yards of soil. Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes.

Table 3.2
Construction Schedule

Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase
Demolition	07/5/2023	08/02/2023	5	20
Site Preparation	08/03/2023	04/10/2024	5	180
Building Construction	04/11/2024	11/04/2025	5	409
Architectural Coating	08/13/2025	11/04/2025	5	60
Total	**28 months**			
Source: CalEEMod Version 2022.1. Output, available in Appendix C to this SCEA.				

3.3.9 Related Projects

The cumulative analysis in this SCEA takes into consideration the 21 Related Projects listed in Table 3.3, *List of Related Projects*, and shown in Figure 3.8, *Related Projects Location Map*. The list of Related Projects is based on information provided by LADOT and the Department of City Planning in accordance with the TAG. TAG states that the

[9] Based on rate of 2.25 persons per multi-family dwelling unit (2.25 x 405 = 911). Source: City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, page 10.

cumulative analysis must include Related Projects within 0.5 miles of the Project Site. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. A significant impact may occur if the Project, in conjunction with the 21 Related Projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis.

Table 3.3
List of Related Projects

No	Project Location	Land Use	Size
1	15225 Vanowen Street	Medical Office	79,127 sf
2	7111 N Sepulveda Boulevard	Apartments Affordable Retail	160 units 20 units 4,750 sf
3	6569 Van Nuys Boulevard	Apartments Affordable Retail	164 units 10 units 18,400 sf
4	7241 N. Sepulveda Boulevard	Gym	25,278 sf
5	7541 N. Sepulveda Boulevard	Apartments Affordable Retail	47 units 7 units 1,056 sf
6	6839 N. Haskell Avenue	Subdivision	17 units
7	7050 N. Van Nuys Boulevard	Apartments Affordable Retail	295 units 37 units 3,963 sf
8	14805 Erwin Street	Apartments Affordable	29 units 4 units
9	14606 Sylvan Street	Apartments Affordable	30 units 4 units
10	14706-12 W. Friar Street	Apartments Affordable	20 units 3 units
11	14552 Ewrin Street	Apartments Affordable	40 units 5 units
12	14400 Vanowen Street	Apartments Affordable	40 units 5 units
13	6633 N. Van Nuys Boulevard	Gym	20,050 sf
14	14203 W. Valerio Street	Middle School	330 students
15	15005 W. Oxnard Street	Self-Storage	98,458 sf
16	14552 Vanowen Street	Apartments Affordable	40 units 5 units
17	14631 W. Friar Street	Apartments Affordable	8 units 3 units
18	6705 N. Sepulveda Boulevard	Subdivision	30 units
19	14541 Gilmore Street	Apartments Affordable	28 units 3 units
20	14629 W. Erwin Street	Apartments	190 units
21	7115 N. Van Nuys Boulevard	Apartments Affordable Retail	190 units 24 units 15,804 sf
Notes:			

Table 3.3
List of Related Projects

No	Project Location	Land Use	Size
sf = square feet *du = dwelling units* *Source: Transportation Assessment for Residential Project Located at 6728 Sepulveda Boulevard, prepared by Overland Traffic Consultants, Inc. dated October 2022. Refer to Appendix D to this SCEA.*			

3.4 REQUESTED PERMITS AND APPROVALS

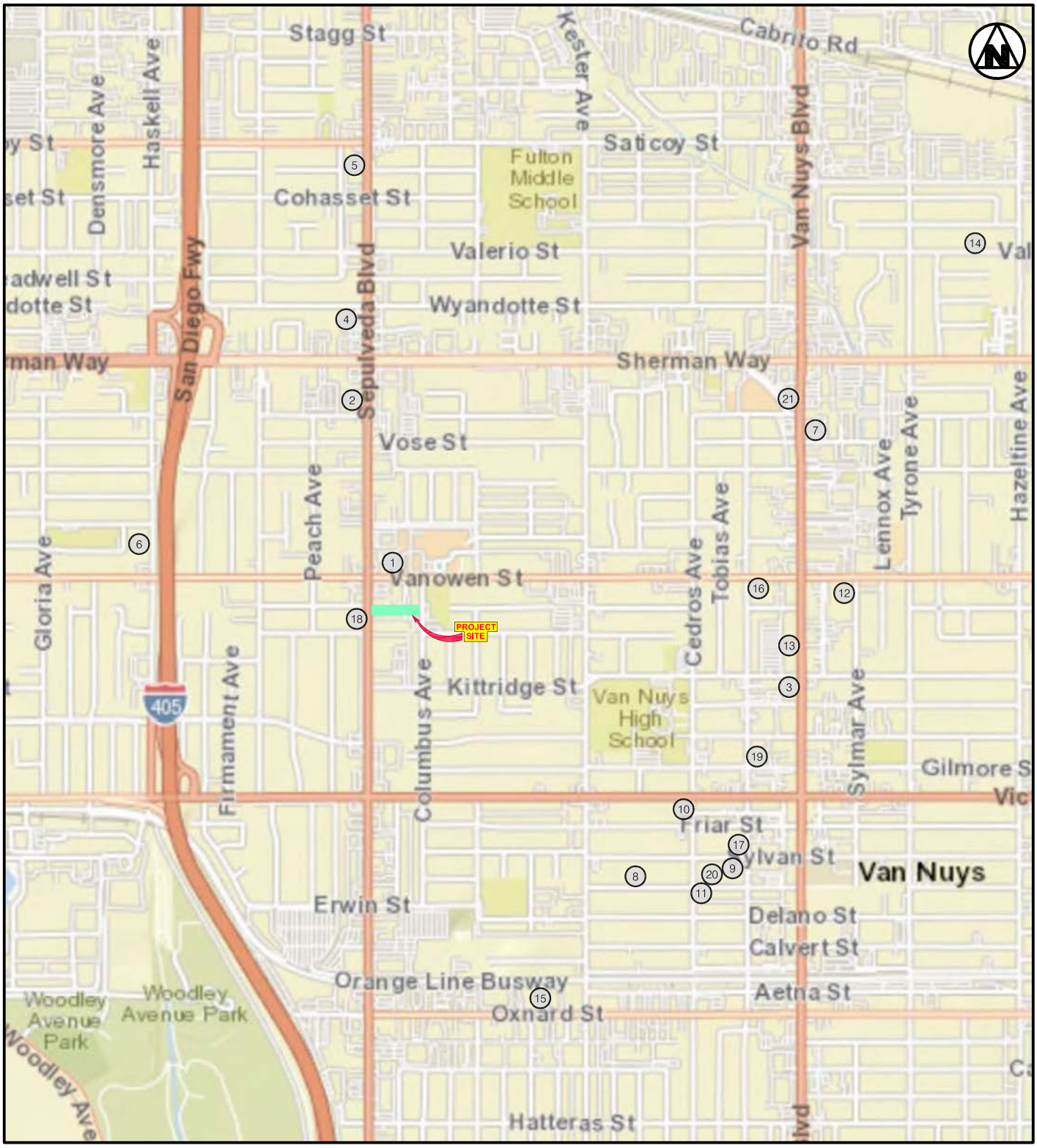
The list below includes the anticipated requests for approval of the Project. The SCEA will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements,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

- Pursuant to LAMC Section 12.22 A.31, a Transit Oriented Communities Affordable Housing Incentives is requested. By providing 41 Extremely Low Income affordable housing units within a Tier 3 incentive area, the Project qualifies for Base Incentives to allow a 70-percent density increase from 238 to 405 units (the Project is proposing up to 405 units), a 50 percent FAR increase from 3.0:1 to 4.5:1 (the Project proposes an FAR of 3.18:1), and a reduced vehicular parking ratio of 0.5 spaces per unit (the Project proposes to provide up to 556 vehicular parking spaces). The Project also qualifies for two additional incentives including a 25 percent reduction in required open space from 43,750 square feet to 32,813 square feet (the Project proposes 32,866 square feet) and an increase of 22 feet in height from 45 feet to 67 feet (the Project proposes a height of 66 feet).
- Pursuant to LAMC Section 16.05. Site Plan Review for the development of 405 residential units.
- Sustainable Communities Environmental Assessment (SCEA), pursuant to California Public Resources Code Sections 21155 and 21155.2 to determine, based on the whole of the administrative record, that no subsequent SCEA, environmental impact report, or negative declaration is required for the Project.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the Project.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- Regional Water Quality Board; and
- South Coast Air Quality Management District.



Source: Overland Traffic Consultants, Inc., September 2022.

Figure 3.8
Related Projects Location Map

4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

4.1 CONSISTENCY WITH TRANSIT PRIORITY PROJECT CRITERIA

Senate Bill (SB) 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). Section 21155(b) of the Public Resources Code defines a TPP for SCEA purposes as a project that meets the following three criteria:

1. Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75);

2. Provides a minimum net density of at least 20 dwelling units per acre; and

3. Is located within one-half mile of a "major transit stop" or "high-quality transit corridor" included in the 2020–2045 RTP/SCS.

Consistency with Criterion #1: Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75)

The Project would construct a 268,770 square foot 100 percent residential building on the Project Site. The entirety of the 268,770 square feet of building area would be for residential use, including dwelling units, ancillary circulation, access lobbies, and residential amenity space. Accordingly, the Project's residential floor area would comprise 100 percent of the Projects' new building square footage. ***Thus, the Project would contain at least 50 percent residential use based on total building square footage and would be consistent with Criterion #1.***

Consistency with Criterion #2: Provides a minimum net density of at least 20 units per acre.

The Project proposes 405 dwelling units on a 2.18-acre (94,951 square foot) site, resulting in an overall net residential density of 186 units per acre. ***Thus, the Project would provide a minimum net density of at least 20 units per acre and would be consistent with Criterion #2.***

Consistency with Criterion #3: Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

A major transit stop is defined in PRC Section 21064.3 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". Pursuant to PRC Section 21155(b), a major transit stop is defined as in PRC Section 21064.3 and also includes major transit stops that are included in the applicable regional transportation plan. A high-quality transit corridor is defined in PRC Section 21155(b) as "[a] corridor with fixed route bus service with service intervals no longer

than 15 minutes during peak commute hours." SCAG defines peak hours as between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M.

The Project Site is located on Sepulveda Boulevard and is served by several bus lines, including, Metro Bus Line 234 (which is a consolidation of Bus Lines 234 and 734) on Sepulveda Boulevard, and Metro Bus Line 165 on Vanowen Street.[10] According to the Metro schedule, effective February 20, 2022, Metro Bus Line 234, which traverses Sepulveda Boulevard between Sepulveda Metrolink Station and Mission College, provides average peak hour headways of approximately 10 minutes in both directions.[11] When Metro's NexGen Bus Plan is fully implemented, headways are expected to be 7.5 minutes during the weekday morning and evening peak commute times, and throughout the midday hours, in both directions. According to the Metro schedule, effective June 26, 2022, Metro Bus Line 165, which traverses Vanowen Street between West Hills and the Burbank Metrolink Station, provides average peak hour headways of approximately 14 minutes eastbound and 12.5 minutes westbound.[12] ***Accordingly, Sepulveda Boulevard meets the statutory definition of a high quality transit corridor and the Project is within one half mile of the intersection of two major bus routes meeting the definition of a major transit stop. The Project is consistent with Criterion #3***.

4.2 SUSTAINABLE COMMUNITIES CONSISTENCY ANALYSIS

SB 375 provides CEQA streamlining benefits to qualifying TPPs which demonstrate consistency with a Sustainable Communities Strategy (SCS), which, if implemented, would achieve the State's greenhouse gas (GHG) reduction targets. For purposes of projects in the SCAG region, a qualifying TPP must demonstrate consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), given the California Air Resources Board's (CARB's) acceptance of SCAG's determination dated October 30, 2020 that the 2020–2045 RTP/SCS would, if implemented, achieve the GHG emission reduction targets for year 2035.

The 2020–2045 RTP/SCS presents strategies and measures that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about what type of development goes where. The role

[10] Metro's NextGen Bus Plan (approved in July 2020) includes transit improvements within the vicinity of the Project Site that are intended to increase frequency and service operation. As part of Metro's NextGen Bus Plan, Bus Line 234 and Metro Bus Line 734 were consolidated with NextGen Line 234 to operate more frequent service along Sepulveda Boulevard adjacent to the Project Site.

[11] The most recent schedule for Metro Bus Line 234, which became effective on February 20, 2022, as well as a description of the Project's consistency with SB 375's Transit Priority Project criteria, is included in Appendix D of this SCEA.

[12] The most recent schedule for Metro Bus Line 165, which became effective on June 26, 2022, as well as a description of the Project's consistency with SB 375's Transit Priority Project criteria, is included in Appendix D of this SCEA.

of the 2020–2045 RTP/SCS in guiding growth is explained in more detail in *Chapter 3, A Path to Greater Access, Mobility, and Sustainability*, of the 2020–2045 RTP/SCS.

4.2.1 Use Designation, Density, and Building Intensity

The 2020–2045 RTP/SCS incorporates center focused placemaking as a land use tool to create dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG. This approach supports attractive and functional places for residents of the region to live, work, and play, with priority placed on urban and suburban infill sites in existing/planned service areas. These centers are typically human-scale, compact, and pedestrian oriented with a variety and housing types and affordability options. To facilitate center focused placemaking, the 2020–2045 RTP/SCS identifies Priority Growth Areas (PGAs) across the SCAG region. PGAs are locations where many of the 2020–2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs). According to the 2020–2045 RTP/SCS, PGAs account for only 4 percent of region's total land area, but implementation of SCAG's recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. The more compact form of regional development implemented through PGAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regionals resources areas. PGAs do not limit any particular development project from being built in any particular location. However, they are intended to guide general growth patterns, which the City of Los Angeles accomplishes through its General Plan and Community Plans. In addition, while the 2020–2045 RTP/SCS does not require individual TPPs to be located within PGAs, the expectation is that most of the more intensive development in the region would be within one or more PGAs. The PGAs are shown in Exhibit 3.4 through Exhibit 3.10 of the of the 2020–2045 RTP/SCS.

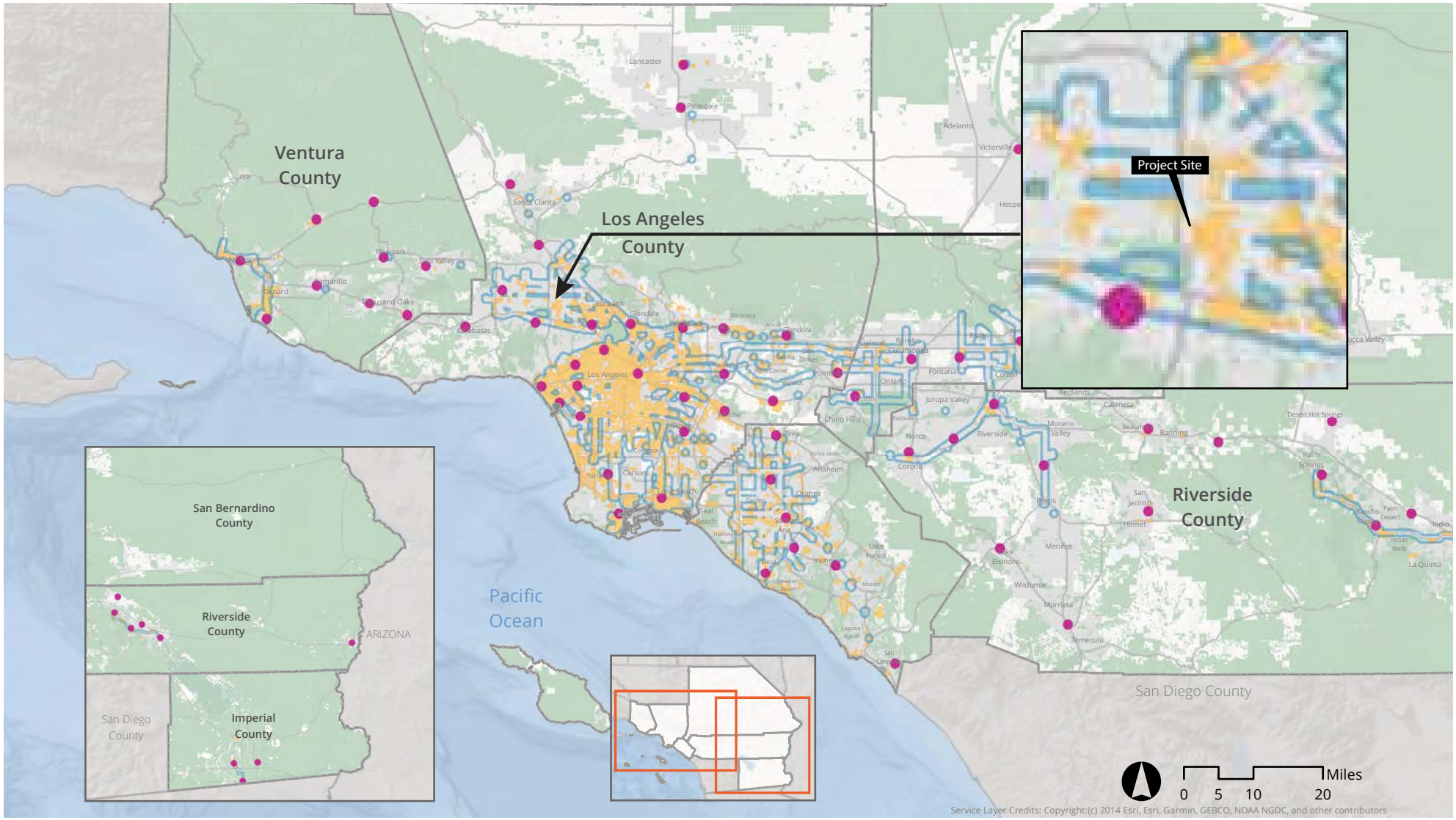
The Project's location relative to each of the PGAs is shown in Figure 4.1 through Figure 4.7. As show in Figure 4.4, Figure 4.5, Figure 4.6 and Figure 4.7, the Project Site is located within the boundaries of a TPA, HQTA and a NMA, and along a Livable Corridor, as described below:

- Transit Priority Areas: TPAs are PGAs within one-half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. TPAs are where Transit Oriented Development can be realized – where people can live, work and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives. The Project site is located within a TPA due to its proximity to Sepulveda Boulevard (a High Quality Transit Corridor with less than 15 minute peak hour bus service).

- High Quality Transit Areas: HQTAs are corridor-focused PGAs within one-half mile of an existing or planned fixed transit stop or bus transit corridor where buses operate at a frequency of at least every 15 minutes during peak commute hours. HQTAs represent under 3 percent of the region's acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. New developments within HQTAs should respond to the existing physical conditions of the surrounding area, preserving existing development patterns and neighborhood character while providing a balance of modal and housing choices. The Project site is located within a HQTA due to its proximity to Sepulveda Boulevard (a High Quality Transit Corridor with less than 15 minute peak hour bus service).

- Neighborhood Mobility Areas: NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds, with a focus on creating, improving, restoring, and enhancing safe and convenient connections to a variety of land uses (e.g., schools, shopping, services, places of worship, parks, and greenways). Safer and shorter multimodal trips are encouraged to reduce the reliance on single occupancy vehicles. This is achieved in NMAs through increased density, mixed land uses, neighborhood design, enhanced destination accessibility, and reduced distance to transit. The Project Site is located within a mapped NMA.

- Livable Corridors: Livable Corridors strategy encourages increased density at nodes along key corridors. This strategy focuses on transit improvements, which include dedicated or semi-dedicated bus lanes, enhanced bus shelters, real-time travel information, and off-bus ticketing; active transportation improvements, which would support safe bicycling and walking; and land use policies, which includes developing mixed-use retail centers at key nodes and increasing neighborhood-oriented retail at intersections. The Project site is located along Sepulveda Boulevard, a designated Livable Corridor.



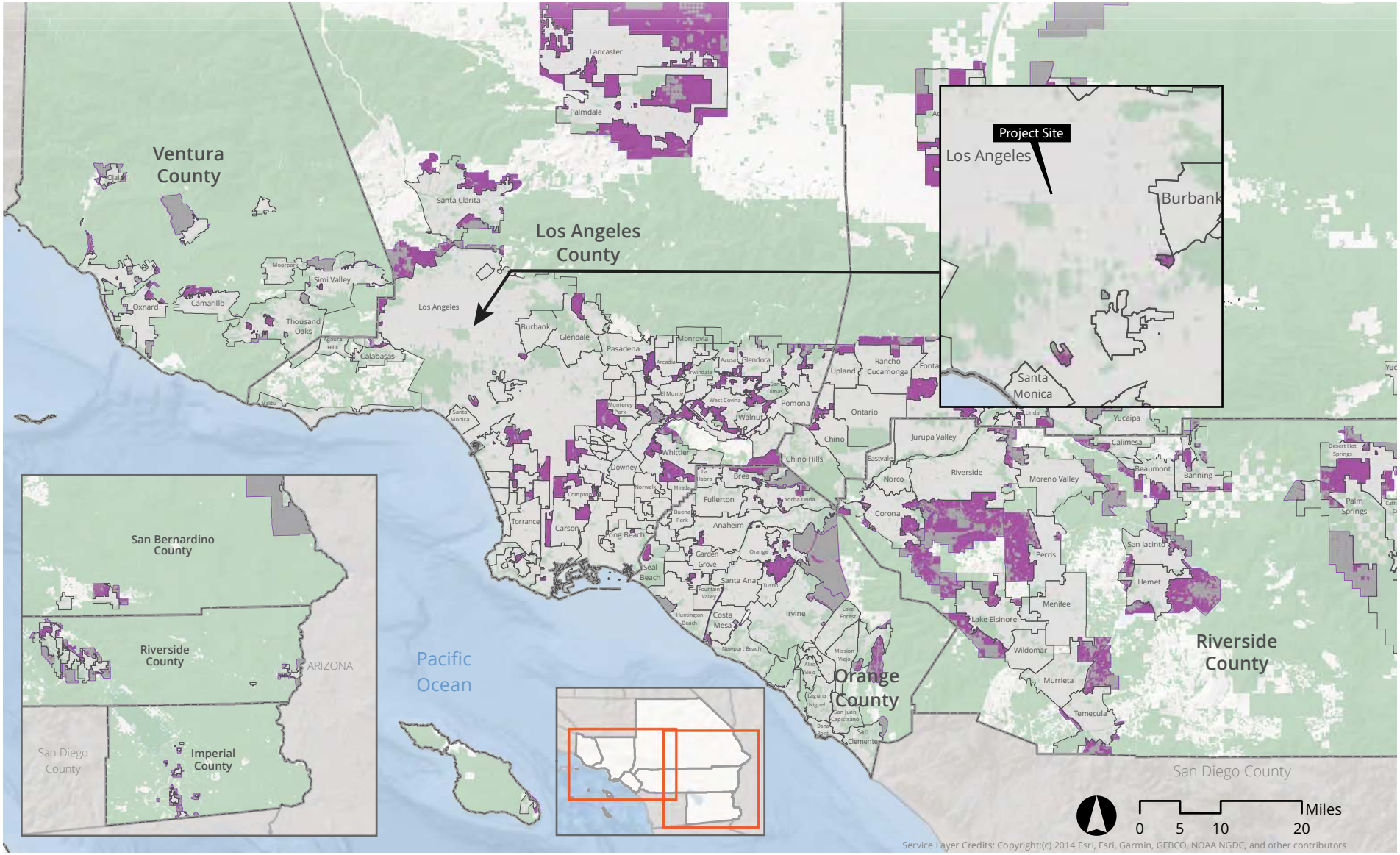
Priority Growth Areas vs. Regional Growth Constraints

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

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

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

Figure 4.1
Priority Growth Areas vs. Regional Growth Constraints

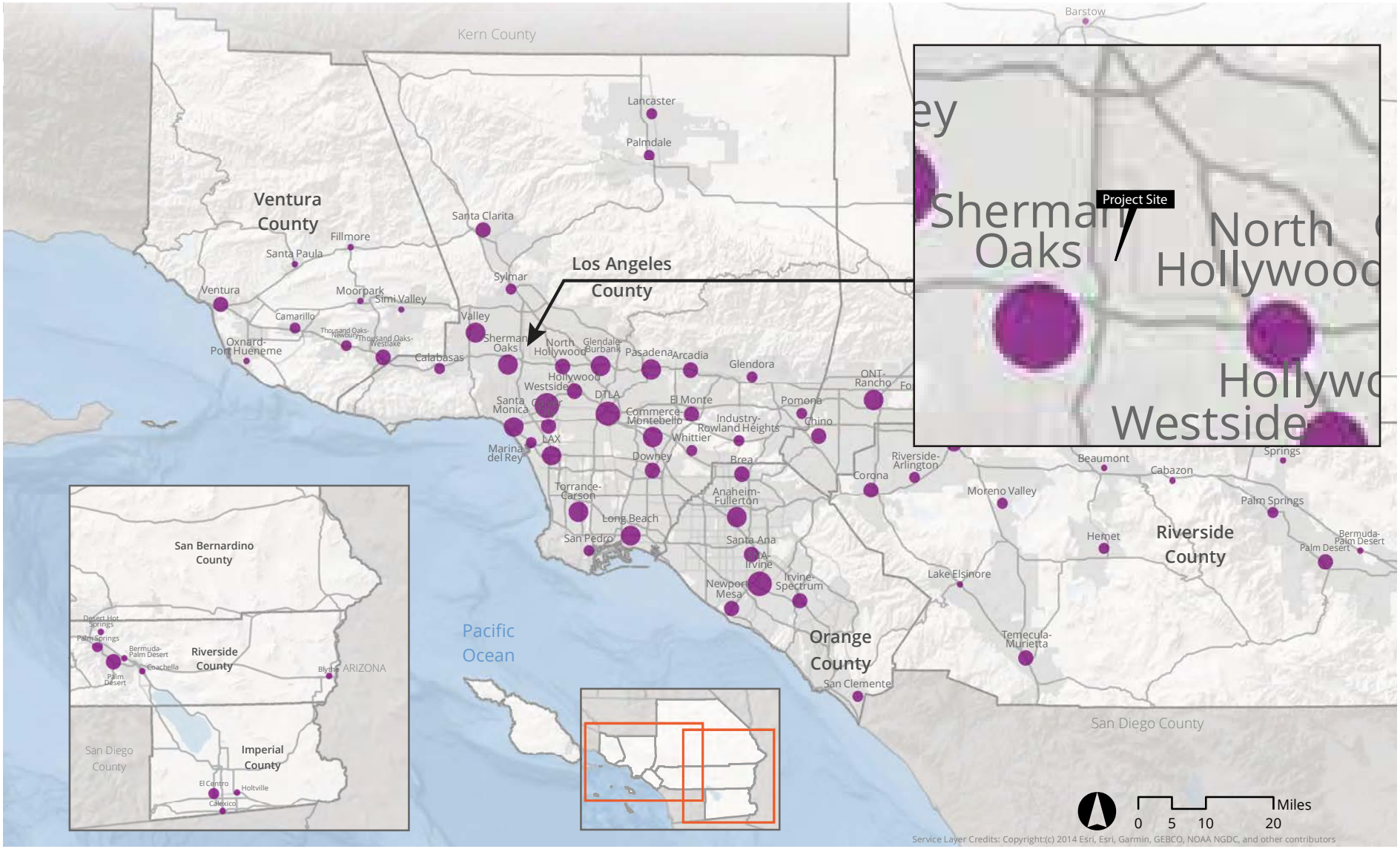


County Boundaries
City Boundaries
Sphere of Influence
Regional Growth Constraints

Source: Counties and local jurisdictions LAFCO in SCAG region, 2018.

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

Figure 4.2
Priority Growth Area - Spheres of Influence



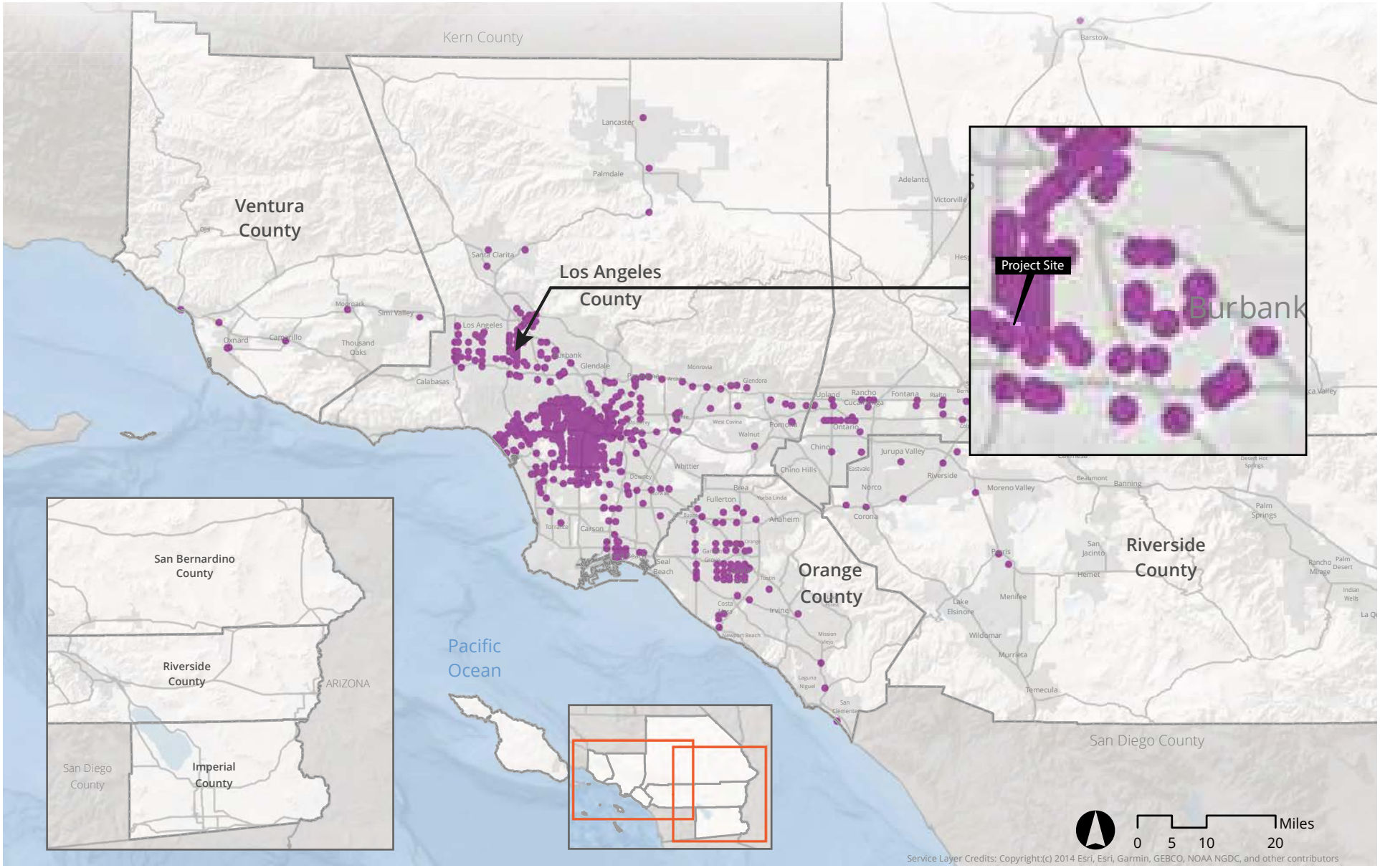
SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Notes:
(1) Centers are areas with denser employment than their surroundings.
(2) Dots represent the total employment in each center, not center boundaries.
(3) Names are intended to be illustrative and may not reflect all the jurisdictions in which a center fully lies.

Source: SCAG, 2019.

Figure 4.3
Priority Growth Area - Job Centers



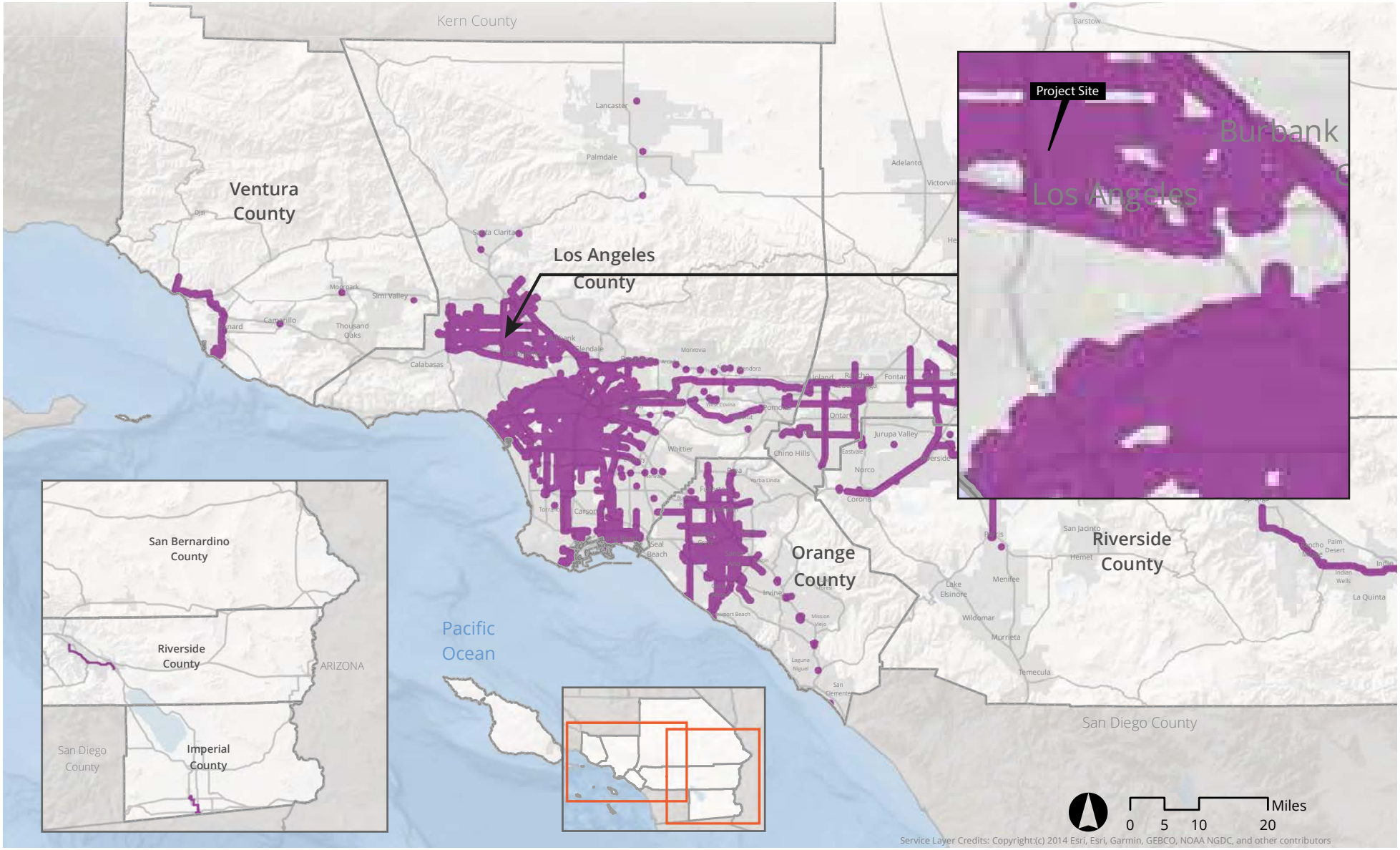
Transit Priority Areas (2045)

TPA

Source: County Transportation Commissions, SCAG, 2019.

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

Figure 4.4
Priority Growth Area - Transit Priority Areas



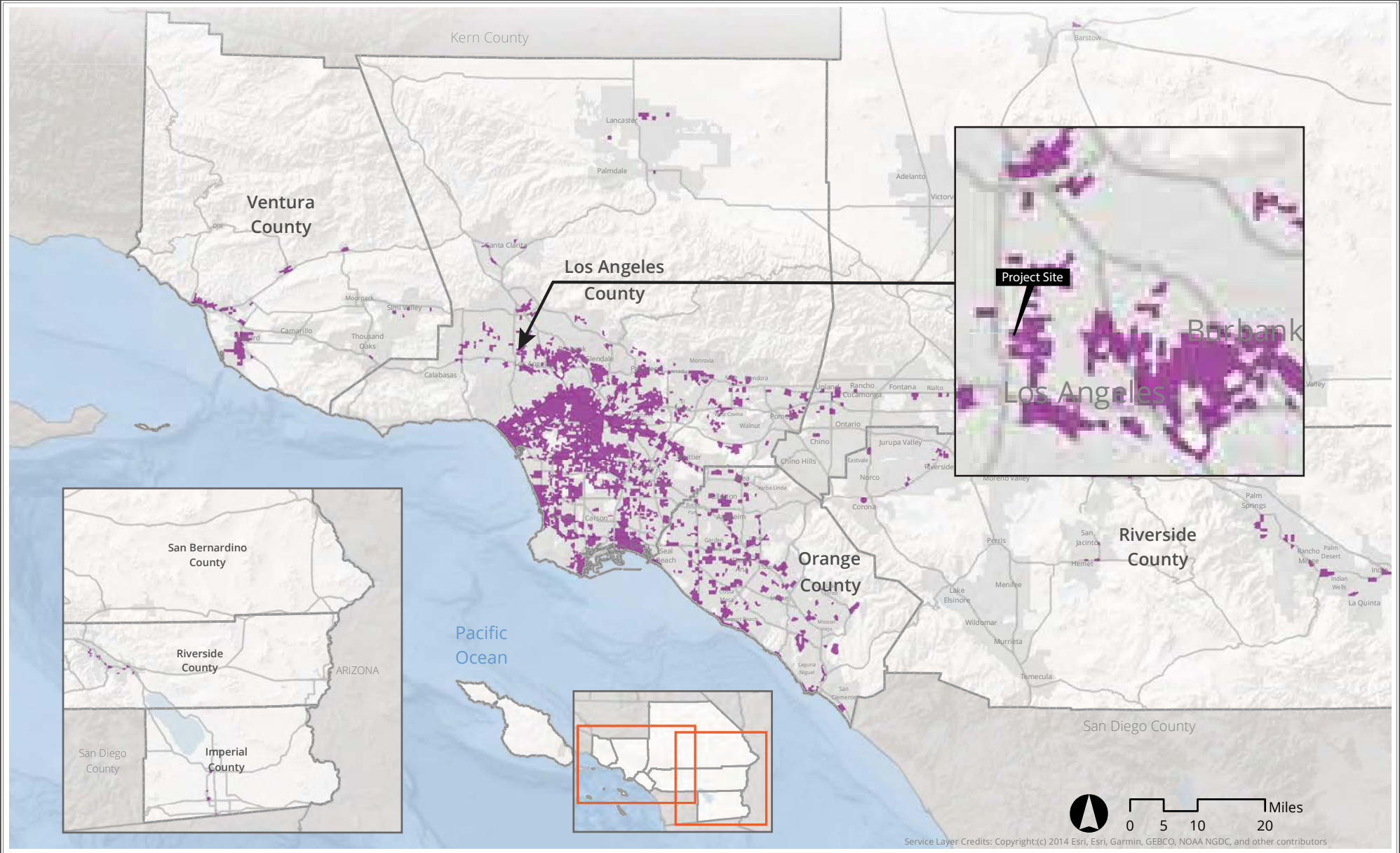
High Quality Transit Areas (2045)

HQTA

Source: County Transportation Commissions, SCAG, 2019.

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

Figure 4.5
Priority Growth Area - High Quality Transit Areas



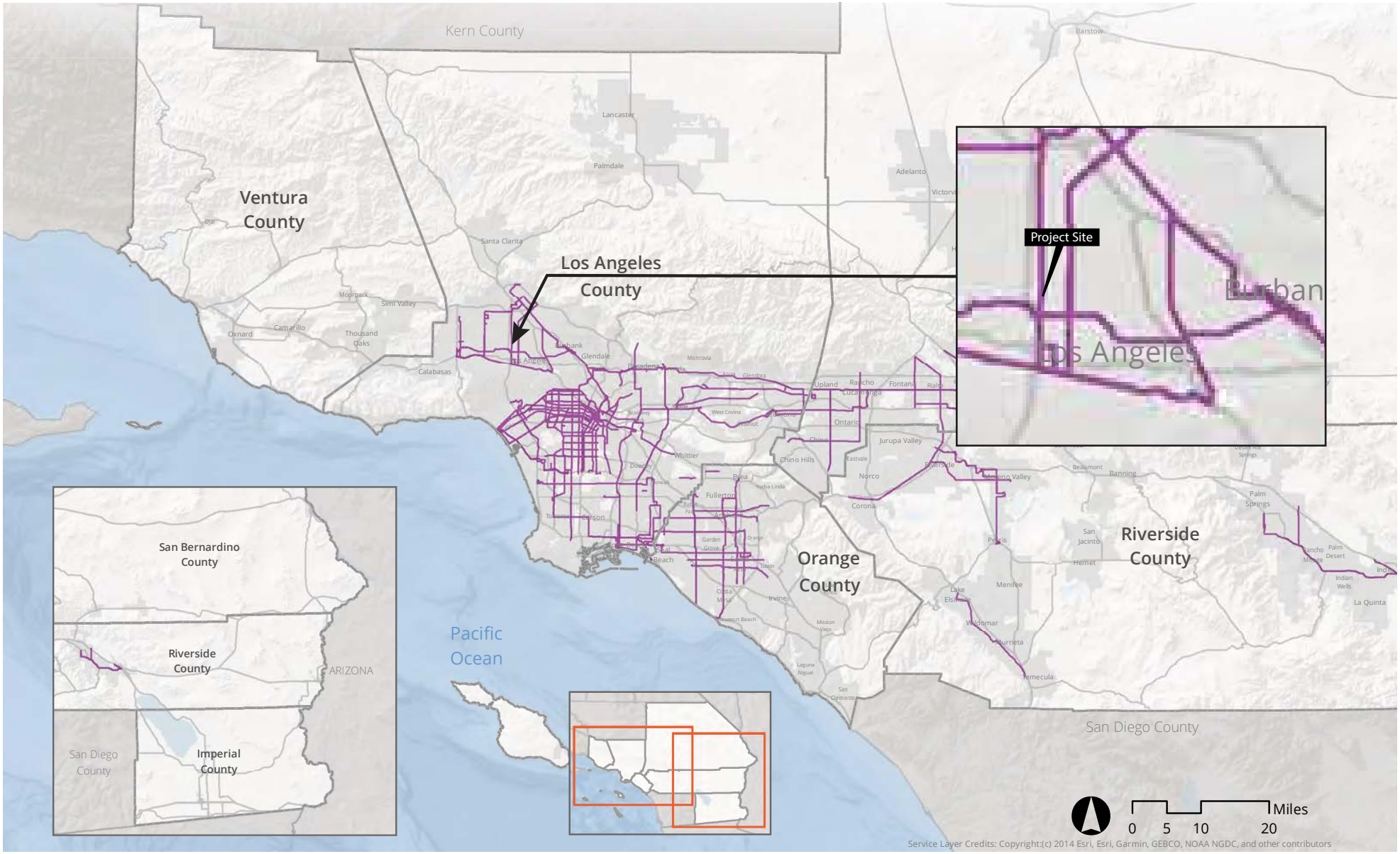
Neighborhood Mobility Areas (NMA)

NMA

Source: SCAG, 2019.

Note: Neighborhood Mobility Areas (NMA) were identified by analyzing and assigning z-scores four measures at the Tier 2 TAZ level, and subsequently summing the z-scores. TAZs that scored at the 80th percentile or higher for the composite score were considered NMAs.

Figure 4.6
Priority Growth Area - Neighborhood Mobility Areas



Livable Corridors

Livable Corridors

Source: SCAG, 2019.

Figure 4.7
Priority Growth Area - Livable Corridors

The Project's location, scale, and mixture of land uses would be consistent with its designation within these four PGAs, which, in turn, indicates consistency with the land use designations, density, and building intensity of the SCS. Specifically, the Project Site is located in an urbanized area within the Van Nuys-North Sherman Oaks Community Plan Area of the City of Los Angeles. The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low- and high-density neighborhoods, commercial uses, and a school. The Project is a residential development that would include 405 residential units (including 41 deed restricted Extremely Low Income units, which is 10 percent of the total Project units), on a site that is well-served by transit. As noted above, the Project is 100 percent residential, with the housing consisting entirely of multi-family dwelling units. The Project would contain a total of 268,770 square feet with a total proposed floor area ratio (FAR) of 3.18:1 and an overall net residential density of 186 units per acre. The Project would significantly increase the housing supply in the Project area, as well as housing diversity and affordability in the PGAs in which the Project Site is located. Of the Project's 405 residential dwelling units, 41 would be reserved for Extremely Low-Income affordable units. In addition, the 405 residential units would include 94 studios, 195 one-bedroom units, 115 two-bedroom units, and one three-bedroom unit in varying sizes and configurations and offered at varying rental prices, thereby providing housing diversity. The Project Site is located near several bus lines, including Metro Bus Line 234, which provides average headways of 10 minutes in the morning and evening peak commute times and Metro Bus Line 165, which provides average headways of approximately 14 minutes eastbound and 12.5 minutes westbound. Thus, the residential nature of the Project in an urban area near transit would provide opportunities for Project residents to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

In addition, the Project would include 194 bicycle parking spaces, including 176 long-term spaces and 18 short term spaces. Bicycle amenities would encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and resulting GHG emissions.

Overall, the nature of the Project, including the location, land uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PGAs. Furthermore, the Project would be consistent with the intent of the specific PGAs in which it is located (i.e., TPAs, HQTA, NMA, and Livable Corridor). ***As such, the Project would be consistent with the 2020–2045 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development***.

4.2.2 Sustainable Communities Strategy Policy Consistency

Chapter 3 of the 2020–2045 RTP/SCS outlines strategies and measures included in the SCS Technical Report that are intended to be supportive of implementing the regional SCS. Several are directly tied to supporting related GHG reductions while others support the broader goals of the 2020–2045 RTP/SCS. As outlined below in Table 4.1, *Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure*, the Project would be consistent with applicable measures of

the SCS. A discussion of the Project's consistency with the applicable goals, as well as a more general discussion of the Project's consistency with the applicable strategies, of the 2020–2045 RTP/SCS is included in Part 5, Evaluation of Environmental Impacts, Section III, Air Quality, of this SCEA.

Table 4.1
Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure

Strategy/Measure	Project Consistency
Strategy: Focus Growth Near Destinations and Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent.** The Project would consist of a residential development that would include market rate and affordable residential units within a PGA. Consistent with the Project Site's location in a TPA, an HQTA, and NMA and along a Livable Corridor, residents of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations.
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** The Project would contribute to a balance between jobs and housing in the region by providing 405 new residential dwelling units within the Van Nuys-North Sherman Oaks Community Plan Area of the City of Los Angeles. The Project Site is located in an urban area near commercial and job centers. Furthermore, the Project Site is located on Sepulveda Boulevard, which is a primary north-south thoroughfare with access to several transit options as well as to I-405.
Plan for growth near transit investments and support implementation of first/last mile strategies.	**Consistent.** The Project Site is served by a variety of public transit options, including Metro Bus Lines 234 on Sepulveda Boulevard, and Metro Bus Line 165 on Vanowen Street; and the Sepulveda Metro G Line (Orange) Station, located approximately 1.0 mile south of the Project Site. Metro Bus Line 234 is identified as a part of Metro's NextGen Bus Plan as a bus line that would be improved with increased frequency and service operation. Thus, the Project would provide for growth near transit investments. First/last mile strategies are designed to increase transit usage by making it more convenient and safer to walk or bicycle to and from transit stations. The Project would implement a variety of first/last mile strategies, including the provision of 194 bicycle parking spaces (176 long-term spaces and 18 short term spaces). In addition, the Project would improve the pedestrian environment around the perimeter of the Project Site by providing new landscaping and improved sidewalk paving.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses**.**	**Not Applicable.** This measure is directed toward public agencies. Furthermore, the Project Site is currently vacant.
Prioritize infill and redevelopment of underutilized land to accommodate new	**Consistent.** The Project would develop a vacant Site with a residential development. The Project would

Table 4.1
Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure

Strategy/Measure	Project Consistency
growth, increase amenities and connectivity in existing neighborhoods.	include landscaped pedestrian access to each of the Project Site's public frontages. In addition, private amenities would be available to residents of the Project, including gym, lounge, recreational, and coworking/amenity rooms, deck areas, including a pool deck area, and roof terraces with landscaping and seating areas. Thus, the Project would represent infill development that would accommodate growth, increase amenities, and enhance connectivity to existing neighborhoods.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** The Project has been designed to incorporate a variety of strategies that would reduce the reliance on, and number of, solo car trips. The Project would include 405 residential units that would be located in an area that is well-served by transit and that has been identified by a PGA. The Project would be designed at a pedestrian scale and would incorporate amenities and improvements, including landscaping, sidewalks, and safety improvements at the Project driveways, that would contribute to the walkability of the area. In addition, the Project would provide 194 bicycle parking spaces (176 long-term spaces and 18 short-term spaces).
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking, smart parking)	**Consistent.** The Project would develop new housing units within a TPA. The Project Site's location near transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Project would improve the public sidewalks adjacent to Project Site and would provide 194 total bicycle spaces to promote travel by bicycle, thereby encouraging active transportation. The Project would also include 11.3 percent of all parking spaces as Electric Vehicle (EV) charging stations and up to 18.7 percent of the total spaces as adaptable for future EV charger installation.
Strategy: Promote Diverse Housing Choices	
Preserve and rehabilitate affordable housing and prevent displacement.	**Consistent.** The Project Site is currently vacant. Thus, the Project would not displace any housing. Rather, the Project would develop 405 new residential units, which would include 41 units set aside for Extremely Low-Income Households.
Identify funding opportunities for new workforce and affordable housing development.	**Consistent.** While this measure is directed toward public agencies, the Project would support its implementation by including 41 Extremely-Low Income units.

Table 4.1
Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure

Strategy/Measure	Project Consistency
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	**Not Applicable.** This measure is directed toward public agencies. However, the Project would increase the housing supply by providing 405 new multi-family residential units.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**Consistent.** This measure is directed toward public agencies and does not apply to an individual projects. However, the Project would support the reduction of greenhouse gas (GHG) emissions by concentrating new residential development on an infill site with access to transit. In addition, the provision of pedestrian features and bicycle amenities would further expand multimodal transportation options, thereby reducing VMT and resulting GHG emissions. Additional sustainability features that would reduce GHG emissions would be incorporated into the Project, including but not limited to, parking spaces with electric vehicle charging equipment, lighting that meets current Title 24 Energy Standards, photovoltaic system ready, highly efficient HVAC systems, energy-efficient wall insulation and glazing units, WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems, and Energy Star–labeled appliances. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable.
Strategy: Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	**Consistent.** The Project would utilize low-emission technologies, including dedicated parking spaces with electric vehicle charging equipment consistent with CalGreen and LA Green Building Code requirements. In addition, the Project would include a passenger loading within the Project, while maintaining the existing street right-of-way. The Project would also provide a total of 194 bicycle parking spaces.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.	**Not Applicable.** This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**Not Applicable.** This measure is directed toward public agencies as a policy strategy and does not apply to individual projects**.**
Strategy: Support Implementation of Sustainability Policies	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	**Consistent.** While this measure is directed toward public agencies, the Project would support its implementation. The Project would include a variety of sustainability measures that would reduce GHG

Table 4.1
Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure

Strategy/Measure	Project Consistency
	emissions, as outlined above in and Part 3, Project Description, of this SCEA.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Consistent.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. However, the Project would support its implementation. The Project would be located within a TPA, HQTA and NMA and along a Livable Corridor. Specifically, Metro Bus Line 234 is located on Sepulveda Boulevard, and Metro Bus Line 165 is located on Vanowen Street, and the Sepulveda station of the Metro G Line is located approximately 1.0 mile south of the Project Site.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Strategy: Promote a Green Region	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Consistent.** While this measure is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. With regard to urban heat islands, the Project would include extensive landscaping, thereby reducing the potential for urban heat islands.

Table 4.1
Consistency of the Project With 2020-2045 RTP/SCS Strategies/Measure

Strategy/Measure	Project Consistency
Integrate local food production into the regional landscape.	**Not Applicable.** This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. Furthermore, the Project area is an urbanized area, and the Project Site is not zoned, or suitable for, agricultural uses.
Promote more resource efficient development focused on conservation, recycling and reclamation.	**Consistent.** The Project is an infill development located in an urbanized area that is served by existing infrastructure. Thus, the Project would not result in the loss of previously undeveloped land or land intended for conservation. Furthermore, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would provide a designated recycling area for Project residents. Thus, the Project would promote resource efficient development.
Preserve, enhance, and restore regional wildlife connectivity.	**Not Applicable.** This measure is directed toward public agencies. Furthermore, the Project Site does not serve as a regional wildlife connector, and as discussed under Section IV, Biological Resources, in Part 5, Evaluation of Environmental Impacts, of this SCEA, the Project would not interfere with wildlife corridors.
Reduce consumption of resource areas, including agricultural land.	**Consistent.** The Project would be developed on a site that has been previously developed with residential uses, is currently vacant, and is zoned [Q]R4-1-RIO (Multiple Dwelling, Height District 1, River Improvement Overlay. No resource areas or agricultural lands would be impacted by the Project.
Identify ways to improve access to public park space.	**Not Applicable.** The Project is an infill development with no direct access to public park space.
Source: Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022; Table Source: EcoTierra Consulting, 2022.	

5 ENVIRONMENTAL IMPACT ANALYSIS

5.1 SCOPE OF ANALYSIS

This section of the Sustainable Communities Environmental Assessment (SCEA) contains an assessment and discussion of impacts associated with issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines [C.C.R. Title 14, Chapter 3, 15000-15387]). Pursuant to PRC Section 21155.2(b), the Initial Study and SCEA are required to identify all significant or potentially significant impacts of the Project, other than those that do not need to be reviewed pursuant to PRC Section 21159.28 based on substantial evidence in light of the whole record.

Pursuant to PRC Section 21155.2(a), the Project must incorporate all feasible mitigation measures, performance standards, or criteria set forth in prior applicable Environmental Impact Reports (EIRs) and adopted in findings made pursuant to PRC Section 21081. A Program Environmental Impact Report (PEIR) was prepared to evaluate the potential environmental impacts of Southern California Association of Government's (SCAG's) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).[13] As part of that PEIR, mitigation measures were included that would reduce potentially significant impacts identified in the PEIR. The complete list of the mitigation measures identified in the PEIR is included in Exhibit A, Revised Mitigation Monitoring and Reporting Program (MMRP), of the Final PEIR. The mitigation measures in the PEIR are divided into two categories: SCAG mitigation measures (referred to in the MMRP as SMM) and project-level mitigation measures (referred to in the MMRP as PMM). SCAG mitigation measures are intended to be implemented by SCAG over the lifetime of the RTP/SCS. Project-level mitigation measures are intended for projects proposing to streamline the environmental review process pursuant to SB 375, SB 743, or SB 226, such as the proposed Project. Project-level mitigation measures outlined in the PEIR should be considered and implemented by a Lead Agency and Project Applicant during project-specific environmental reviews, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. However, since SCAG has no authority to impose mitigation measures, a lead agency must use its independent discretion to determine whether mitigation measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in this PEIR as appropriate to address project-specific conditions.

In compliance with PRC Section 21151.2, the City has reviewed all of the mitigation measures in the 2020–2045 RTP/SCS PEIR MMRP and determined their potential applicability to the Project. This applicability analysis is included in the analysis below for each environmental issue identified under Appendix G of the of the State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) the MMRP's mitigation measure; (2) an equivalent, equally

[13] SCAG, Certified Final PEIR for the 2020-2045 RTP/SCS, May 2020, https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618. Accessed: September 2022.

effective City mitigation measure (consistent with the MMRP mitigation measures); (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. Where applicable, any additional project design features and/or mitigation measures are identified in this section to reduce or avoid all potentially significant impacts on the environment.

Cumulative Impacts

The Initial Study and SCEA are also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs. Where a cumulative effect has been adequately addressed and mitigated in the prior applicable certified EIR, the cumulative effect shall not be treated as cumulatively considerable. CEQA defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of Related Projects is based on information provided in September 2022 by the City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Department of City Planning. Although these projects serve as context for the development environment in the Project vicinity, the application of the Related Projects to analyses of specific environmental impacts will vary due to the unique characteristics and geographic context of each environmental impact. The cumulative analyses for each environmental issue are provided below following the assessment of Project impacts.

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating impacts of a transit priority area project under CEQA, as follows: "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." 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 "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 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the

perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI 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 City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[14]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this SCEA, is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this SCEA is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

[14] 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. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed October 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.

b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.

c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.

d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.

e) Retain or replace trees bordering highways, so that clear-cutting is not evident.

f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is

complementary to the dominant landscaping or native habitats of surrounding areas.

g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity.

h) Use see-through safety barrier designs (e.g. railings rather than walls).

Applicability to the Project

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, PMM AES-1 is not applicable to the Project.

PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.

b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.

c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.

d) Design projects consistent with design guidelines of applicable general plans.

e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape

management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.

f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:

   – use transparent panels to preserve views where sound walls would block views from residences;

   – use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; and

   – construct sound walls of materials whose color and texture complements the surrounding landscape and development.

g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.

Applicability to the Project

The Project is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included below is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality rather than on visual character. Thus, as Mitigation Measure PMM AES-2 addresses visual character, it is not applicable to the Project.

PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Use lighting fixtures that are adequately shielded to a point below the light build and reflector and that prevent unnecessary glare onto adjacent properties.

b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.

c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

d) Use unidirectional lighting to avoid light trespass onto adjacent properties.

e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light sensitive uses. Ongoing over the life of the plan Lead Agency Revised MMRP for the Connect SoCal Plan, Exhibit A Resolution No. 20-624-1 Impact Sciences, Inc. 4 Revised MMRP for the Connect SoCal Plan, Exhibit A 1329.001 September 2020 Mitigation Measure Mitigation Monitoring Timing Responsible Monitoring Entity

f) Provide structural and/or vegetative screening from light-sensitive uses.

g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.

h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.

i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

Applicability to the Project

As analyzed below, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. As such, Mitigation Measure PMM AES-3 is not applicable to the Project.

Impact Analysis

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

Less than Significant Impact. A significant impact would occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is approximately 2.18 acres (94,951 square feet) in size and is currently a vacant partially paved lot. The Project Site is relatively flat and is comprised of a rectangle parcel of land bounded by Sepulveda Boulevard on the west, Columbus Avenue on the east, and commercial development on the north and south. The existing viewshed at the Project Site is defined by

existing urban development comprised of a mix of low- and high-density neighborhoods, commercial uses, and a school.

There are no existing views of mountains, beaches or oceans, or other similar scenic vistas available from the Project Site or the streets immediately surrounding the Project Site. A significant impact occurs only when a project adversely affects the public view of a scenic vista and, therefore, impacts to private views are not considered to be significant and no further analysis is required. ***Thus, due to the urbanized nature of the area and the lack of access to scenic vistas, the Project would not block or obstruct views of visual resources. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.***

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

Less Than Significant Impact. A significant impact would occur if scenic resources within a State scenic highway would be damaged and/or removed by development of a project. There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.[15] There are also no City-designated scenic highways in the Project Site vicinity.[16] ***Therefore, as the Project Site is not located along a state scenic highway, the Project would not substantially damage scenic resources within a state scenic highway, and no impacts would occur.***

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

Less Than Significant Impact. A significant impact may occur if, in a non-urbanized area, the project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, the project would conflict with applicable zoning or regulations governing scenic quality.

The Project is located in a highly urbanized area in the Van Nuys community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality. Local land use regulations applicable to the Project Site that include policies that address scenic quality include the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan Framework Element (Framework Element), the Van Nuys-North Sherman Oaks Community Plan (Community Plan),

[15] California Department of Transportation, California Scenic Highway Mapping System, Officially Designated County Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed October 2022.

[16] City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A2 – Valley Subarea.

and Citywide Design Guidelines. These plans, policies, and regulations are discussed in more detail below.

Los Angeles Municipal Code

Chapter 1 of the LAMC, referred to as the City of Los Angeles Planning and Zoning Code, sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. The Project Site is zoned [Q]R4-1-RIO (Multiple Dwelling, Height District 1, River Improvement Overlay District). Pursuant to the LAMC Section 12.11 A, the R4 Zone permits community/commercial uses (including churches, childcare facilities, hotels, motels, schools, museums, libraries, and retirement hotels, etc.) as well as any residential land use allowed in the R3 zone (including multiple family dwellings). The Height District 1 designation for the R4 Zone permits an FAR of 3:1 and a height limit of 45 feet. The Project Site is located within a River Improvement Overly District (RIO), which includes additional development regulations regarding landscaping, screening/fencing, and lighting.

The Project consists of the construction of a 268,770 square-foot, 405 unit (including 41 affordable housing units, which is 10 percent of the total Project units) residential development comprised of a six-story structure with three subterranean parking levels. The 94,951 square foot (2.18 acre) Project Site is currently vacant. The Project would incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space in the form of gym, lounge, recreational, and coworking/amenity rooms, deck areas, including a pool deck area, and roof terraces with landscaping and seating areas. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies.

The Project would be consistent with LAMC scenic quality requirements regarding lighting and signage. The Project would include pedestrian-scale exterior lighting fixtures along pathways for security and wayfinding purposes. Project lighting would be designed to minimize light spill-over from the Project Site, reduce sky-glow, and improve nighttime visibility through glare reduction. All exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties.

The Project Site is also subject to the scenic quality requirements of the RIO District. Effectuated by Ordinance No. 183,145 in August 2014, the RIO District enables the City of Los Angeles to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City's boundaries. The RIO District is a Supplemental Use District that requires new development projects to meet development regulations addressing landscaping, screening and fencing, and lighting, and orientation in association with the Los Angeles River. The purposes of the RIO District are to support the goals of the Los Angeles River Revitalization Master Plan

(LARRMP);[17] contribute to the environmental and ecological health of the City's watersheds; provide native habitat and support local species; establish a positive interface between the Los Angeles River and adjacent properties; promote pedestrian, bicycle and other multi-modal connections between the river and surrounding neighborhoods; provide an aesthetically pleasing environment; provide safe, convenient access to and along the river; promote river identity; and support the City's stormwater ordinances and programs. As shown in Appendix A of this SCEA, the landscape plans show design elements included as part of the Project specifically to meet the Los Angeles RIO District regulations, including landscaping with native trees, plants and shrubs; recreational amenities, such as a swimming pool and deck, outdoor areas for lounging, and indoor amenities, such as fitness and recreational rooms. Prior to issuance of a building permit, the Project Applicant would be required to obtain an Administrative Clearance from the Department of City Planning confirming compliance with all of the applicable regulations of the Los Angeles RIO District.

General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. Specifically with regard to aesthetics, the Framework Element includes goals, policies, and objectives regarding the scale and character of neighborhoods (Objective 4.3), the quality of development and public realm (Chapter 5), and topics related to lighting (Chapter 9). The Project's consistency with each of the relevant goals, policies, and objectives is outlined in Table 5.10, *Applicable Goals, Objectives, and Policies of the General Plan Framework Element*, in Section XI, Land Use and Planning of this SCEA.

The Project Site is located in an urbanized setting of the Van Nuys community. The Project Site, which is currently vacant, is surrounded by a mix of low- and high-density neighborhoods, commercial uses, and a school. Building structures near the Project Site vary in height from one to five-stories.

The Project would be a maximum of 66 feet (six stories) and has been designed to be sensitive to existing surrounding development. Currently, there are several buildings with generally similar heights in the Project area, including:

- 15243 Vanowen Street, 6-story medical office building, located approximately 528 feet north of the Project Site, along Vanowen Street;

[17] County of Los Angeles, Los Angeles River Revitalization Master Plan, June 2022, https://pw.lacounty.gov/uploads/swp/LARiverMasterPlan-FINAL-DIGITAL-COMPRESSED.pdf. Accessed October 2022.

- 15166 Vanowen Street, 6-story hospital, located approximately 600 feet northeast of the Project Site, along Vanowen Street; and
- 6717 Sepulveda Boulevard, 3-story multi-family townhomes, located directly west of the Project Site, along Vanowen Street.

Considering the existing building heights in the area, the height of the Project would not introduce an incompatible element to the existing visual character of the area. The proposed design is compatible with the design elements of surrounding buildings. Therefore, the visual quality and character impacts associated with the proposed building's height would be less than significant and no mitigation measures are required.

The Project includes mid-rise building which fronts on Sepulveda Boulevard. The massing has been thoughtfully designed to take into account the adjacency of the elementary school and smaller scale commercial uses by including a large break in massing on the southern façade and expansive open space areas, further breaking up the massing of the building from all perspectives. Specifically, the Project includes a large courtyard at the second floor which breaks up the building's overall scale providing visual interest at the southern façade and a roof deck. The overall building façade, with a simple white and salmon stucco finish, steps back from the street to visually lessen the scale of the Project from the street and sidewalk and includes extensive landscaping.

The Project would not be out of character with the Van Nuys area, or with other development surrounding the Project Site. It would replace the existing underutilized vacant site with an urban-scale, transit-oriented project that would be reflective of the expected visual character of the area as it develops in the future in accordance with adopted land use plans, including regional plans, the General Plan Framework, and the Van Nuys-North Sherman Oaks Community Plan, all of which envision further development concentration in transit station areas in general, and in this area of the City in particular.

The Project's design is high quality, contemporary architecture with articulated walls and varied colors that is compatible with the more contemporary designs that have been incorporated in buildings constructed in the area over the recent decade. The Project has been designed to create a vibrant community and pedestrian-oriented streetscape along a primary transit corridor.

Overall, the Project design would contribute to the overall quality of the visual environment and would not contrast with the varying design elements of the uses adjacent to the Project Site. The Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Framework Element's regarding scenic quality.

Van Nuys-North Sherman Oaks Community Plan

The Urban Design Chapter (Chapter 5) of the Community Plan includes general policies for individual multi-family residential projects and outlines specific standards, designs, and guidelines that carry out the policies for individual projects. The intent of the policies and standards in the

Urban Design Chapter for commercial corridors is to provide and maintain the visual continuity of streetscapes and to create an environment that encourages pedestrian and economic activity. In multi-family residential areas, the emphasis is to promote architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents. As the Project is a residential development, not all of the policies are applicable, particularly those related to site planning for commercial uses. However, as outlined further in Table 5.12, *Applicable Goals, Objectives, and Policies of the Van Nuys-North Sherman Oaks Community Plan*, in Section XI. Land Use and Planning of this SCEA, the Project would be consistent with the relevant design policies for individual projects included in the Community Plan.

The design of the building would include a large break in massing on the southern façade and expansive open space areas, further breaking up the massing of the building from all perspectives. In addition, building façades would be articulated through inset residential balconies, light wells, and landscaping and would incorporate a variety of complementary buildings materials that would serve to break up the façades. Consistent with the Community Plan, rooftop equipment and trash collection areas would be screened from view and all of the parking would be provided in subterranean levels, thereby integrating the parking structure into the design of the buildings.

Thus, the Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Community Plan regarding scenic quality.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Project conforms to the Citywide Design Guidelines (adopted by City Planning Commission October 24, 2019), as shown in Table 5.1, *Citywide Design Guidelines.*

Table 5.1
Citywide Design Guidelines

Guideline	Would the Project Conflict?
Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.	**No conflict.** The Project would include design elements that reinforce orientation to the street, such as a glass façade with well-defined pedestrian entrances on Sepulveda Boulevard and Columbus Avenue. The entrances would include signage so that pedestrians can safely and comfortably enter and exit. Glass facades and ample landscaping would further create a transparent and welcoming environment for pedestrians as they either enter or walk around the Project Site. The Project would also comply with Americans with Disabilities Act (ADA) requirements.
Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.	**No conflict.** Pedestrian spaces would be separated from vehicular circulation to enhance safety. Vehicle access to the three subterranean parking levels and internal loading area, would be provided with one 28 foot wide driveway at the south of the Project Site. The proposed parking driveway would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	**No conflict.** The Project has been designed to create a vibrant community and pedestrian-oriented streetscape along a primary transit corridor. The lobby and residential amenities at the ground level incorporate large glass windows and doors offering views into building to create variety along the pedestrian level. The overall building façade steps back from the street to visually lessen the scale of the Project from the street and sidewalk.
Guideline 4: Organize and shape projects to recognize and respect surrounding context.	**No conflict.** The Project has been designed with a pedestrian-oriented streetscape along a primary transit corridor. The façade of the Project is designed with varying materials and treatments to create a unique street frontage while maintaining the pedestrian experience at street level with high ground-floor façade transparency.
Guideline 5: Express a clear and coherent architectural idea.	**No conflict.** The Project's design is high quality, contemporary architecture with articulated walls and distinctive architectural features. The Project's façade provides a variety of architectural materials and building planes while creating a pedestrian-scaled project at the street level with glass and varietal materials.
Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.	**No conflict.** The Project would provide 20,711 square feet of landscaping and 32,866 square feet of open space and amenities, which would include gym, lounge, recreational, and coworking/amenity rooms, deck areas, including a pool deck area, and roof terraces with landscaping, seating areas, and BBQs. The Project also enhances the area with ample

Table 5.1
Citywide Design Guidelines

Guideline	Would the Project Conflict?
	landscaping along the perimeter of the Project, and 115 trees throughout the Project Site and sidewalks.
Guideline 7: Carefully arrange design elements and uses to protect site users.	**No conflict.** Project proposes to include clearly delineated and safely accessible entrances along Sepulveda Boulevard and Columbus Avenue for pedestrians. Vehicular access would be safely provided via one driveway on Sepulveda Boulevard.
Guideline 8: Protect the site's unique natural resources and features.	**No conflict.** The Project Site is currently vacant and partially paved. No unique natural features are present.
Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.	**No conflict.** The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space. Further, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project's energy consumption.
Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.	**No conflict.** The Project proposes to include ample landscaping with a variety of trees and shrubs that promote opportunities for stormwater capture. Landscaping will conform to City requirements for native and drought tolerant plants where feasible.
Source: City of Los Angeles, Citywide Design Guidelines, October 24, 2019. EcoTierra Consulting, 2022.	

Based on the above, the Project would not conflict with applicable regulations governing scenic quality, including those contained in the LAMC, General Plan Framework Element, Community Plan, and Citywide Design Guidelines. Therefore, impacts would be less than significant. ***Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Therefore, Project impacts related to scenic quality would not be significant.***

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

Less Than Significant Impact. A significant impact may occur if the development introduces new sources of light or glare on or from a project site which adversely affect day or nighttime views in the area.

Construction

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction lighting would be

to increase the overall ambient glow emanating from the Project Site. Per the requirements of the LAMC, construction hours would be limited to 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. As such, Project construction lighting would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. Therefore, less than significant impacts would occur related to construction lighting.

Operation

Light

The Project is located in a well-lit area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Sepulveda Boulevard is a major thoroughfare with six lanes of traffic and includes lighted streets along its length in this area. Columbus Avenue is a thoroughfare with two lanes and includes lighted streets along its length in this area.

The streets in these areas are lit using city standard streetlights. The Project Site is located within an urban environment, thus, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As land uses surrounding the Project Site are already lit from existing development in the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would increase lighting effects compared to the existing vacant Project Site. There are several sensitive use receptors near the Project Site that could be susceptible to light impacts created by the Project. Sensitive uses are defined by Los Angeles Municipal Code Chapter IX, Article 3, Section 93.0117 as any exterior glazed window or sliding glass door on any other property containing a residential unit or units, elevated habitable porch, deck, or balcony on any other property containing a residential unit or units, or any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

The light-sensitive uses in the vicinity include the three-story multi-family residential development, Midvale Village, located across Sepulveda Boulevard, the Beverly Manor Convalescent Center, located directly south of the Project Site, and the single-family residential uses located along Columbus Avenue, southeast of the Project Site.

The Project is designed with windows and residential lighting. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. With compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties.

The Project would include building address signage. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with LAMC Section 14.4.4-E, illumination used for Project signage would be limited to a light intensity of 3-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. However, with compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties, nor would they represent a substantial change in the lighting environment of the Project Site and surrounding area. As such, Project lighting would not result in substantial changes to existing artificial light conditions and would not interfere with off-site activities. Therefore, impacts related to Project interior and exterior light sources would be less than significant.

Glare

The Project would incorporate both solid and glass surfaces. The Project building would be prohibited from the using highly reflective building materials such as mirrored glass on exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future. As such, the Project would not include elements that incorporate substantial amounts of reflective building materials in areas that are highly visible to off-site glare-sensitive uses. Exterior building materials would use various non-reflective material designed to minimize the transmission of glare from building. Therefore, impacts related to daytime glare would be less than significant.

The Project would adhere to existing regulatory requirements regarding light and glare, including those contained in the LAMC, the City's Green Building Code, and CALGreen (e.g., LAMC Section 93.0117(b), LAMC Section 99.05.106.8, CALGreen Section 5.106.8). ***Thus, based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant. Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."***

Cumulative Impacts

Less Than Significant Impact. The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the aesthetics analysis above.

The nearest related project to the Project Site is No. 18, located at 6705 N. Sepulveda Boulevard, which is comprised of 30 multi-family residential units (see Figure 3.8, *Related Projects Location*

Map). This project is directly west of the Project and is currently under construction and is almost complete. The other 20 Related Projects in the vicinity are visually obstructed from the Project Site by existing built environment and are not located within the same viewshed as the Project Site. Therefore, the Related Projects would not combine with the Project to result in a cumulative aesthetic impact.

The Related Projects are reasonably anticipated to include landscape, lighting, building materials, and signage that would be visually compatible with the surrounding neighborhood, based on City requirements. As discussed above, the Project would result in less than significant impacts to aesthetics and would improve the existing visual character and quality of the Project Site. ***Furthermore, PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable and cumulative impacts would be less than significant***.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.

b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.

c) Maintain and expand agricultural land protections such as urban growth boundaries.

d) Provide for mitigation fees to support a mitigation bank[18] that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

[18] The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks, https://www.wildlife.ca.gov/Conservation/Planning/Banking. Accessed October 2022.

e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.

f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

Applicability to the Project

As analyzed below, the Project would not convert farmland to a non-agricultural use, and therefore, PMM AG-1 is not applicable to the Project.

PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.

b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.

Applicability to the Project

The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. Thus, PMM AG-2 is not applicable to the Project.

PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.

Applicability to the Project

The Project Site does not contain forest land or timberland and therefore, PMM AG-3 is not applicable to the Project.

PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.

b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.

c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

Applicability to the Project

The Project Site is not zoned for agricultural uses and there is no farmland on the Project Site. Thus, PMM AG-4 is not applicable to the Project.

PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for

acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

Applicability to the Project

The Project Site is not zoned for agricultural uses and is not located adjacent to agricultural uses. Thus, PMM AG-5 is not applicable to the Project.

Impact Analysis

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

No Impact. A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half and is located in a developed area of the City. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[19] Thus, the Project would not result in the loss of State-designated Farmland. ***Therefore, the Project would not convert farmland to a non-agricultural use and no impacts would occur***.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use. The Project Site is zoned [Q]R4-1-RIO and has a General Plan land use designation of General Commercial. Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. The Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract. ***Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract and no impact would occur.***

[19] State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published 2018.

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. There are no forest or timberland resources on this fully developed site that is in an urbanized part of the City.

In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned [Q]R4-1-RIO and has a General Plan land use designation of General Commercial. The Project Site is not zoned for forest land, timberland, or timberland production land uses. ***Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code section 4526, and Government Code section 51104(g) and no impact would occur.***

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

No Impact. A significant impact may occur if a project results in the conversion of forest land to another, non-forest use. The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half and is located in a developed area of the City. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. ***Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur***.

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. The Project Site is previously developed and located in an urbanized area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. ***Therefore, the Project would not result in the conversion of farmland to non-agricultural use or forest land use and no impact would occur***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the analysis above. The cumulative impacts study area for agriculture and forestry resources is the

extent of the Related Projects (see Figure 3.8, *Related Projects Location Map*). The Project Site and Related Projects are located in a developed area of the City, and none of these respective sites contain State-designated farmland.[20] Neither the Project Site nor the Related Projects are located on land currently used as agriculture or forest land, or on land zoned for agricultural uses or forest land, timberland, or Timberland Production. Thus, neither the Project nor the Related Projects would result in the conversion of existing agricultural uses or zoning to a non-agricultural use, nor result in the loss of forest land, timberland, Timberland Production or zoning, or the conversion of forest land to non-forest use. ***Therefore, the Project's contribution to cumulative impacts regarding agricultural resources would not be cumulatively considerable and no cumulative impacts would occur***.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

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

[20] State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2012, published January 2015.

Lead Agency:

a) Minimize land disturbance.

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

c) Cover trucks when hauling dirt.

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

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

f) Minimize unnecessary vehicular and machinery activities.

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

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

i) On Caltrans projects, Caltrans Standard Specifications 10—Dust Control, 17—Watering, and 18—Dust Palliative shall be incorporated into project specifications.

j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.

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

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

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

roadway.

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

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

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

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

r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds

to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

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

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

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

v) As applicable for airport projects, the following measures should be considered:

    a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.

    b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.

    c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.

w) As applicable for port projects, the following measures should be considered:

    a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).

    b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.

    c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.

d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.

e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.

f. Encourage the participation in the Green Ship Incentives.

g. Offer incentives to encourage the use of on-dock rail.

x) As applicable for rail projects, the following measures should be considered:

a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.

y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.

a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.

b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.

c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.

d. Provide information to residents on where MERV filters can be purchased.

e. Provide recommended schedule (e.g., every year or every six

months) for replacing the enhanced filtration units.

f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.

g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.

h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and

i. Develop a process for evaluating the effectiveness of the enhanced filtration units.

    aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities

    bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsor as appropriate and feasible:

        – Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.

        – Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85% diesel engines on site shall be Tier 2 or higher.

        – Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85%for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.

        – Emission control technology shall be operated, maintained, and serviced as recommended by the

emission control technology manufacturer.

– Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less

– The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:

    i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.

    ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.

    iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.

– The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.

– The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator on-site, includes:

    i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.

    ii. Any problems with the equipment or emission controls.

iii. Certified copies of fuel deliveries for the time period that identify:

1. Source of supply

2. Quantity of fuel

3. Quantity of fuel, including sulfur content (percent by weight)

cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:

– Install programmable thermostat timers

– Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).

– Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)

– Install higher efficacy public street and area lighting

– Limit outdoor lighting requirements

– Replace traffic lights with LED traffic lights

– Establish on-site renewable or carbon neutral energy systems—generic, solar power and wind power

– Utilize a combined heat and power system

– Establish methane recovery in Landfills and Wastewater Treatment Plants.

– Locate project near bike path/bike lane

– Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and

public spaces, minimize pedestrian barriers.

- Provide traffic calming measures, such as:
    i. Marked crosswalks
    ii. Count-down signal timers
    iii. Curb extensions
    iv. Speed tables
    v. Raised crosswalks
    vi. Raised intersections
    vii. Median islands
    viii. Tight corner radii
    ix. Roundabouts or mini-circles
    x. On-street parking
    xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
    i. Elimination (or reduction) of minimum parking requirements
    ii. Creation of maximum parking requirements
    iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
    i. Designate a certain percentage of parking spacing

for ride sharing vehicles

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

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

iv. Permanent transportation management association membership and finding requirement.

Applicability to the Project

The measures included in PMM AQ-1 are not applicable to the Project. As shown below, none of the Project's emissions exceed SCAQMD thresholds and existing regulatory measures that would apply to the Project, including those identified by the California Air Resources Board (CARB) and SCAG to facilitate consistency with applicable air quality plans, as discussed below, are equal to or more effective than the measures of PMM AQ-1.

Impact Analysis

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

Less than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the National Ambient Air Quality Standard (NAAQS) (e.g., ozone, particulate matter ($PM_{2.5}$), and PM_{10}). The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from Southern California Association of Governments' (SCAG's) 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) designed to focus growth near High Quality Transit Areas (HQTAs) and to reduce vehicle miles traveled (VMT).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements, including the Transportation Conformity Rule and other applicable federal, State, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the

goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The California Air Resources Board (CARB) is the lead agency for climate change programs and oversees all air pollution control efforts in California to attain and maintain health-based air quality standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable State greenhouse gas emissions targets. The 2020-2045 RTP/SCS was incorporated into the 2022 AQMP. Therefore, this analysis considers the Project's consistency with the 2022 AQMP.

Every three (3) years the SCAQMD prepares a new AQMP, updating the previous plan and having a 20-year horizon. In May 2022, the SCAQMD completed the 2022 Draft AQMP. The 2022 Draft AQMP is focused on attaining the 2015 8-hour ozone standard (70 ppb) for the South Coast Air Basin and Coachella Valley. The Draft 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emission technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP was adopted December 2, 2022, by SCAQMD Governing Board. The 2022 AQMP strategy includes the following:[21]

- Wide adoption of zero emissions technologies anywhere available.
- Low NOx technologies where zero emissions aren't feasible.
- Federal Action.
- Zero emissions technologies for residential and industrial sources such as water and space heaters in buildings and homes regionwide.
- Incentive funding in environmental justice areas.
- Prioritize benefits on the most disadvantaged communities.

The 2022 AQMP was approved and adopted by CARB on January 26, 2023.The 2022 AQMP was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment of the AQMP's goals. Therefore, projects, uses, and activities

[21] SCAQMD 2022 AQMP Infographic. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2022-aqmp-infographic. Accessed: April 2023.

that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency with the AQMP assumptions is determined by performing an analysis of the Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Project are based on the same forecasts as the AQMP.

As discussed earlier, the 2022 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS that are themselves largely based on growth forecasts from local governments like the City. Thus, a project is consistent with the 2022 AQMP, in part, if the project is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP. The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. The Project Site is designated "General Commercial" by the General Plan and zoned R4-1-RIO, which permits the site's proposed land use with state-mandate density bonuses. As such, 2020-2045 RTP/SCS assumptions about population and employment growth in the City accommodate the Project's land use on this site.

The 2020-2045 RTP/SCS presumes an increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure, in some cases even outpacing what is currently anticipated by local general plans. Development of the Project would be consistent with this land use pattern and smart growth policies to increase housing density within HQTAs given that the Project Site is located within a Transit Priority Area and an HQTA. The Project would contribute to the 2020-2045 RTP/SCS's goal of encouraging growth of walkable and mixed-use communities with ready access to transit infrastructure. By developing dense residential housing in close proximity to transit, the Project would contribute directly to the goals of the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS and, by extension, the 2022 AQMP.

The Project would include up to 405 multi-family residential units, which could generate approximately 984 residents. According to SCAG data, the City of Los Angeles subregion had a total population of 3,933,800 persons in 2016. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 288,790 between 2016 and 2026, and by 548,710 persons between 2026 and 2045. The addition of these new residents would be within the SCAG growth projection, representing approximately 0.34 percent of the Citywide total growth for the period of 2016 to 2026, and approximately 0.18 percent of the Citywide total growth for the period of 2026 to 2045. This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion. The Project's estimated employment growth projections would not conflict with SCAG's future growth projections for the City of Los Angeles.

The Project would support fewer vehicle trips by locating 405 new housing units (and approximately 984 new residents) in a neighborhood that is served by several Metro bus lines, which run bus lines along Sepulveda Boulevard and Vanowen Street. The Project Site is also located within one-mile of the Sepulveda Metro G Line (Orange) Station. SCAG's 2020-2045 RTP/SCS land use goals and policies focus on the reduction of vehicle trips and VMT. Per the City's Traffic Assessment Guidelines (TAG), projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and greenhouse gases (GHG) goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2020-2045 RTP/SCS and would have a less-than-significant cumulative impact on VMT. As a project design feature (see TR-PDF-1, in Section XVII Transportation), the Project proposes to reduce parking and provide a sufficient number of bicycle parking to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21 A.16 with 18 short-term bicycle parking spaces, 176 long-term bicycles spaces. With the project design of reduced parking through permissible reductions and bicycle parking per LAMC, the household VMT per capita is 7.3, which does not exceed the VMT threshold and would be a less than significant VMT impact.

In conclusion, the Project is an infill development near transit within an existing urbanized area that would provide 405 dwelling units, including 41 affordable housing units, within a Transit Priority Area (TPA), thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. As discussed above, the Project would be consistent with the growth assumptions, goals, and policies of the AQMP and, therefore, would not conflict with or obstruct implementation of the SCAQMD's AQMP. ***Therefore, this impact would be less than significant and no mitigation measures are required*.**

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?

Less than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants.

The Project has been evaluated to determine if it will violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it will result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin (SCAB) is non-attainment under an applicable federal or State ambient air quality standard. The significance of these potential impacts is described below.

Standards of Significance

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table 5.2, *SCAQMD Air Quality Significance Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. It should be noted that the SCAQMD provides a

threshold for emissions of lead, however for purposes of this analysis no lead emissions are calculated as there are no substantive sources of lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

Construction Emissions

Emissions are estimated using the California Emissions Estimator Model (CalEEMod) (Version 2022.1) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. CalEEMod is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[22]

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The program uses the Emission Factor (EMFAC2021) computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the Off Road (OFFROAD2017) computer program to calculate emission rates for heavy truck operations. EMFAC2021 and OFFROAD2017 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of Project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in Appendix C of this SCEA document.

[22] South Coast Air Quality Management District, California Emissions Estimator Model, website: http://www.aqmd.gov/caleemod/. Accessed December 2022.

Table 5.2
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC [b]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants [c]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	 10.4 µg/m^3 (construction) [d] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	 10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation)	
Sulfate 24-hour average	 25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Source: SCAQMD CEQA Handbook (SCAQMD, 1993).*

[b] *The definition of volatile organic compounds (VOC) includes reactive organic gas (ROG) compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.*

[c] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.*

[d] *Ambient air quality threshold based on SCAQMD Rule 403.*

Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: December 2022.

Construction activities associated with the Project will result in emissions of VOCs, nitrogen oxide (NO_X), sulfur oxide (SO_X), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Demolition
- Foundation/Excavation
- Building Construction

- Architectural Coating

Construction is expected to start no sooner than the third quarter of 2023 and take approximately 28 months. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[23] The construction activities for the Project are anticipated to include: demolition of an existing approximately 38,900 square-foot surface parking lot, excavation and foundation work, construction of an approximately 6-story building (313,236 square feet gross floor area) that includes: 405 apartments, 20,711 square feet of landscaping, and a 556-space (207,406 gross floor area), 3-level subterranean parking structure, and application of architectural coatings. The Project's footprint is 69,441 square feet. During foundation/excavation work, there would be approximately 77,277 cubic yards of export.

Dust is typically a major concern during demolition and excavation/grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mile per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (approximately 2.18 acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures is used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur and is incorporated into the emissions modeling for the Project.

Construction emissions for construction worker vehicles traveling to and from the Project Site, as well as vendor trips (construction materials delivered to the Project Site) were estimated based

[23] As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version 2020.4.0, Section 4.3.2 "Off-Road Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 have been taken.

The estimated maximum daily construction emissions are summarized in Table 5.3, *Construction-Related Regional Pollutant Emissions*. Detailed construction model outputs are presented in Appendix C to this SCEA.

Table 5.3
Construction-Related Regional Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions[1,2]	37.0	25.6	46.6	0.05	7.07	2.55
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[1] *Includes both on-site and off-site emissions. On-site emissions from equipment operated on-site that is not operated on public roads. Demolition and site preparation PM_{10} and $PM_{2.5}$ emissions include compliance with SCAQMD Rule 403.*
[2] *Construction and painting phases may overlap.*
Source: CalEEMod Version 2022.1. Output, available in Appendix C to this SCEA.

As shown in Table 5.3, emissions resulting from the Project construction would not exceed regional criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. **Thus, a less than significant impact would occur for Project-related construction-source regional emissions and no mitigation measures are required**.

Operational Emissions

Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. Rule 1113 (Architectural Coatings) limits paints applied to buildings to 50g/L VOC content.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Fireplaces

The Project is not proposing to install any fireplaces and therefore would not result in any emissions associated with hearths/fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (State) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. Please see Section VI Energy, for additional details on energy use.

Mobile Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project.

On July 30, 2019, the City of Los Angeles updated its travel demand model, impact evaluation methodology, and transportation impact thresholds based on VMT. In accordance with the new CEQA Section 15064.3, although the City considers the Level of Service (LOS) which measures vehicle delay during the Site Plan Review process, the Significance of Transportation Impacts for the purposes of CEQA are now determined using the VMT metric.

CalEEMod uses trip generation rates to determine mobile source emissions from Project-generated vehicle trips. The Traffic Study[24] VMT analysis showed that the Project would generate 1,717 daily vehicle trips and 13,356 daily VMT (with incorporation of the TDM strategies reduced parking supply and bicycle infrastructure, which are incorporated as a project design feature TR-PDF-2). The CalEEMod program then applies the emission factors for each trip, which is provided by the EMFAC2021 model, to determine the vehicular traffic pollutant emissions. Please see the CalEEMod output in Appendix C of this SCEA for details.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts. The worst-case summer or winter criteria pollutant emissions created from the Project's long-term operations have been calculated and are shown below in Table 5.4, *Regional Operational Pollutant Emissions*.

Table 5.4
Regional Operational Pollutant Emissions

Operational Activities	Pollutant Emissions (pounds/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	**16.7**	**5.97**	**79.4**	**0.12**	**3.92**	**0.87**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod Version 2022.1 the higher of either summer or winter emissions, available in Appendix C of this SCEA.						

The results from Table 5.4 show that none of the SCAQMD regional thresholds would be exceeded. ***Thus, a less than significant impact would occur for Project-related operational-source regional emissions and no mitigation measures are required****.*

Therefore, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, thus, would be less than significant. No mitigation measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

[24] Overland Traffic Consultants, Inc. Transportation Assessment for Residential Project Located at 6728 Sepulveda Boulevard in the City of Los Angeles. October 2022.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors;" they are also known to be locations where an individual can remain for 24 hours.

The Project Site is located within an urbanized setting in the Van Nuys community of the City of Los Angeles. Property in the surrounding area is characterized by a mix of low- and high-density neighborhoods, commercial uses, and a school. Specifically, the properties to the west, across Sepulveda Boulevard are zoned [Q]RD1.5-1-RIO and are improved with Midvale Village, comprised of three-story residential townhomes. The properties immediately to the north are zoned C2-1CL-RIO and are improved with one-story uses, including a commercial shopping center. The property to the east is zoned PF-1XL-RIO and is improved with the Columbus Avenue Elementary School. The property immediately to the south is zoned [Q]R4-1-RIO and is improved with the one-story Beverly Manor Convalescent Center.

Construction

Localized Significance – Construction

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds (LSTs).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM_{10}, and $PM_{2.5}$ from the Project could result in a significant impact to the local air quality. The emission thresholds

were calculated based on the West San Fernando Valley source receptor area (SRA) 6 and a screening disturbance value of 2 acre per day (as the Project Site is approximately 2.18 acres).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the Project Site include: the Center for Healthy Living Senior Citizen Center located adjacent to the northern boundary of the eastern portion of the Project Site, the Beverly Manor Convalescent Center located 25 feet to the south of the Project's southern boundary; the multi-family residential use located west of Sepulveda Boulevard and south of Archwood Street, approximately 110 feet from the Site; the single-family uses located on the western side of Columbus Avenue at Lemay Street, approximately 170 feet from the Project's southern boundary; and the Columbus Avenue Elementary School located on the eastern side of Columbus Avenue, approximately 65 feet east of the Site. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts. Table 5.5, *Local Construction Emissions at the Nearest Receptors*, shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

Table 5.5
Local Construction Emissions at the Nearest Receptors

	On-Site Pollutant Emissions (pounds/day)			
Activity	**NO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Demolition	15.4	15.0	0.72	0.66
Foundation/Excavation	20.3	18.9	3.46	2.14
Building Construction	11.2	11.9	0.46	0.42
Architectural Coating	1.42	1.72	0.03	0.03
SCAQMD Thresholds [a]	**147**	**644**	**6**	**4**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *The nearest sensitive receptors to the Project Site include: the Center for Healthy Living Senior Citizen Center located adjacent to the northern boundary of the eastern portion of the Project Site, the Beverly Manor Convalescent Center located 25 feet to the south of the Project's southern boundary; the multi-family residential use located west of Sepulveda Boulevard and south of Archwood Street, approximately 110 feet from the Site; the single-family uses located on the western side of Columbus Avenue at Lemay Street, approximately 170 feet from the Project's southern boundary; and the Columbus Avenue Elementary School located on the eastern side of Columbus Avenue, approximately 65 feet east of the Site; therefore, the 25 meter threshold was used.*

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2 acres at a distance of 25 m in SRA 6 West San Fernando Valley.

The data provided in Table 5.5, shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors.

Construction-Related Toxic Air Contaminants

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction

TAC emissions. Given the temporary and short-term construction schedule (approximately 28 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxic Control Measure that limits diesel powered equipment and vehicle idling to no more than five (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 Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

Therefore, a less than significant local air quality impact would occur from construction of the Project and no mitigation measures are required.

Operation

Localized Significance – Operation

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive receptors to the Project Site include: the Beverly Manor Convalescent Center located 25 feet to the south of the Project's southern boundary; the multi-family residential use located west of Sepulveda Boulevard and south of Archwood Street, approximately 110 feet from the Site; the single-family uses located on the western side of Columbus Avenue at Lemay Street, approximately 170 feet from the Project's southern boundary; and the Columbus Avenue Elementary School located on the eastern side of Columbus Avenue, approximately 65 feet east of the Site.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the Site; such as industrial warehouse/transfer facilities. The Project includes the operation of a residential apartment building. Due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots Analysis

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality

generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and federal CO standards, which were presented above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles City Department of Transportation evaluated the LOS in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

Per the Traffic Study in Appendix D of this SCEA, the Project would generate a total of 1,717 daily trips with incorporation of project design features. Figure 5 in the Traffic Study (found in Appendix D of this SCEA) showed that intersection with the highest peak hour volumes in the Project vicinity is located at Sepulveda Boulevard and Kittridge Street. The Future with Project Traffic Volumes PM Peak hour volume is 1,570, which would contribute to an average daily traffic (ADT) volume of 16,990. Therefore, as the intersection with the highest volume falls far short of 100,000 vehicles a day, no CO "hot spot" modeling was performed and no significant long-term air quality impact is anticipated to local air quality with the ongoing use of the Project.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

According to the SCAQMD *CEQA Air Quality Handbook*, an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

> "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
>
> The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals."

If the Project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project involves the construction and operation of mixed residential/commercial uses; which are not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as architectural coatings. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Trash receptacles for the Project would be covered, and odors from trash would be contained within the trash area. Therefore, as the Project is required to comply with SCAQMD Rule 402, the Project would not create objectionable odors affecting a substantial number of people. ***Potential impacts associated with objectionable odors would be less than significant and no mitigation is required***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the air quality analysis above**.** SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable. Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. ***As described above, the Project does not generate any regional or localized emissions that exceed SCAQMD's thresholds; therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment, and cumulative air quality impacts would be less than significant.***

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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 US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.

b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat.

c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.

d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.

e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.

f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.

g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.

h) Appoint a qualified biologist to monitor implementation of mitigation measures.

i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

j) Develop an invasive species control plan associated with project construction.

k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.

l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.

m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.

o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.

Applicability to the Project

The Project would remove three non-protected trees which could potentially provide nesting sites for migratory birds. Thus, as discussed below, the Project would be required to comply with the Migratory Bird Treaty Act and Section 3503 of the California Department of Fish and Wildlife Code which regulate vegetation removal during the nesting season (February 1st to August 30th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations which are equivalent to or more effective than PMM BIO-1, would ensure that no significant impacts to nesting birds would occur. Thus, PMM-BIO-1 is not applicable to the Project.

PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.

b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.

c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.

d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.

e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are

occupied by birds afforded protection pursuant to the MBTA during the breeding season.

f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.

g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.

h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.

i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.

j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.

k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.

l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.

m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.

n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.

o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified

wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.

p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist

q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).

r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Applicability to the Project

As discussed below, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Therefore, Mitigation Measure PMM BIO-2 is not applicable to the Project.

PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.

b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.

c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:

   – Permittee-responsible mitigation

   – Contribution of in-kind in-lieu fees

   – Use of in-kind mitigation bank credits

   – Where avoidance is determined to be infeasible and

d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:

   – Avoidance

   – Impact Minimization On-site alternatives

   – On-site alternatives

   – Off-site alternatives

e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Adherence to regulatory requirements during construction and operation; and compliance with City grading permit regulations, would ensure that construction and operation of the Project would not result in the removal, filling, or other means of hydrological interruption of the nearest body of water, the Sepulveda Basin Wildlife Area, located over 1.09 miles southwest of the Project Site. These measures are equal to or more effective than the measures included in PMM BIO-3. Therefore, the measures included in Mitigation Measure PMM BIO-3 are not applicable to the Project.

PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.

b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.

c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.

d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.

e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.

f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.

g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.

h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.

i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.

j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).

l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.

m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.

n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.

o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with

the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in PMM-BIO-1(b), where applicable:

- Wildlife movement buffer zones
- Corridor realignment
- Appropriately spaced breaks in center barriers
- Stream rerouting
- Culverts
- Creation of artificial movement corridors such as freeway under or overpasses
- Other comparable measures

p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.

q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.

r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.

s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:

- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
- Design exterior lighting to confine illumination to the project site
- Provide structural and/or vegetative screening from light-sensitive uses.

- Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
- Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:

- Install temporary noise barriers during construction.
- Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves

should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

– Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.

– Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

– Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

u) Require large buffers between sensitive uses and freeways.

v) Create corridor redundancy to help retain functional connectivity and resilience.

Applicability to the Project

As discussed below, there are no established wildlife corridors or nursery sites on the Project Site. The Project would be required to comply with the Migratory Bird Treaty Act and California Fish and Game Code, which regulate vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to resident and migratory birds would not occur. These regulatory compliance measures are equal to or more effective than relevant measures under PMM BIO-4. Thus, PMM BIO-4 is not applicable to the Project.

PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.

b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.

c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.

d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.

e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.

f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.

g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.

h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources.

i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:

  – Avoidance strategies

  – Contribution of in-lieu fees

  – Planting of replacement trees

  – Re-landscaping areas with native vegetation post-construction

  – Other comparable measures developed in consultation with local agency and certified arborist.

Applicability to the Project

There are no trees of "protected" status as defined under City Ordinance 177,404. Furthermore, No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, PMM BIO-5 is not applicable to the Project.

PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.

b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.

c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.

Applicability to the Project

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, PMM BIO-6 is not applicable to the Project.

Impact Analysis

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

Less Than Significant Impact. A significant impact may occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited. The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half and is located in a developed area of the City. The Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[25] The Project Site does not contain any habitat capable of sustaining 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. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species.

[25] Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed October 2022.

However, the Project would remove all of the existing on-site landscaping, including the three non-native trees on the Project Site. The Project would incorporate extensive landscaping on the Project Site that would include approximately 115 trees, as well as a mix of shrubs and groundcover. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. However, birds protected by the Migratory Bird Treaty Act may nest within the trees that would be removed as part of the Project.

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project Applicant would be required to conduct tree removal activities associated with the Project outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest.

Compliance with the Migratory Bird Treaty Act and California Fish and Game Code, would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Thus, impacts would be less than significant.

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

No Impact. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half and is located in a developed area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. ***The Project would not 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 and impacts would be less than significant***.

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

No Impact. A significant impact may occur if state or federally protected wetlands are modified or removed without adequate mitigation. The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half and is located in an urbanized area of the City. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[26] Furthermore, the Project Site is fully developed and does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. ***Therefore, the Project would not have a substantial adverse effect on state or federally protected wetlands, and no impact would occur***.

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?

Less Than Significant Impact. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. As discussed above, the Project Site is located in an urbanized area and is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half. In addition, the areas surrounding the Project Site are fully developed or undergoing construction, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[27]

There are a total of three (3) on-site trees, California palms (*Washingtonia filifera*), and 4 street trees adjacent to the Project in the public right-of-way. The Applicant would remove the three (3) on-site trees, and new trees would be planted in place in accordance with the City's requirements. Although unlikely, the existing trees to be removed could potentially provide nesting sites for migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the California Fish and Game Code and

[26] U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, http://www.fws.gov/wetlands/Data/Mapper.html. Accessed October 2022.

[27] Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public. Accessed October 2022.

California Department of Fish and Wildlife has never promulgated any regulations interpreting these provisions.

As discussed above, to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent required by applicable law. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the California Department of Fish and Wildlife. ***Compliance with the Migratory Bird Treaty Act and the California Fish and Game Code would ensure that the Project would not 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. Impacts would be less than significant.***

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

- Oak tree including Valley Oak (Quercus lobata), California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa);
- Southern California Black Walnut (Juglans californica var. californica);
- Western Sycamore (Platanus racemose); and
- California Bay (Umbellularia californica).

There are currently four street trees located along Columbus Avenue. No street trees would be removed. However, the Project application proposes to remove three (3) non-protected trees located in the eastern portion of the Project Site.

Furthermore, the applicant would be required to improve the right-of-way. Prior to any work on the right-of-way, the applicant would be required to obtain approved plans from the Department of Public Works. Note, no street tree or protected tree may be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this document, no approvals have been given for any tree removals on-site.

Pursuant to the LAMC, the existing trees would be replaced at a ratio of 2:1 with a minimum 24" box replacement tree for a total of six (6) trees. In addition, per LAMC 12.21 G 2, one 24" box tree for every four (4) dwelling units would be required, for a total of 102 required trees. The Project proposes 115 trees, including seven (7) street level trees and 108 trees on-site, pending Department of Urban Forestry approval.

The Project Site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. Additionally, there is limited vegetation landscaping on and adjacent to the Project Site. Construction of the Project would not affect any protected trees. ***Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant***.

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

No Impact. A significant impact may occur if a project is inconsistent with resource policies of any conservation plans of the types cited above. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[28] ***Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.***

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the biological resources analysis above. The cumulative impacts biological resources study area is the extent of the Related Projects.

The Project Site and the Related Projects are located in a developed area in the City. However, it is unknown whether or not any of the properties on which the Related Projects are located contain biological resources, such as sensitive species or protected trees, but each Related Project would be required to comply with local, state and federal regulations to protect sensitive species and protected trees. Further, as the Project would have no potentially significant impacts to biological resources (see analysis above), there is no potential for the Project to contribute to a cumulative impact. ***Therefore, cumulative impacts to biological resources would be less than significant.***

[28] California Department of Fish and Wildlife, California State Wildlife Action Plan, September 2015.

V. CULTURAL RESOURCES

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

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

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

a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.

b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.

c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer

in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:

- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.

- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.

d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.

e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.

f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a

record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.

g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.

h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.

i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs.

   Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as

indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS

k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.

l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

Applicability to the Project

As discussed below, there are no structures or other potentially historic resources on the Project Site. Consistent with PMM CULT-1(f), a CHRIS record search was conducted through the South Central Coastal Information Center (SCCIC), which did not identify any archaeological resources. Because no resources have been identified, no specific avoidance measures are warranted. Nevertheless, the Project would be required to adhere to mitigation regarding the inadvertent discovery of archaeological resources, as outlined in MM-CUL-1, below. MM-CUL-1 is a standard City mitigation measure which is equivalent to or more effective than PMM CULT-1 and would ensure that no significant impacts to archeological resources would occur. Thus, the PMM CULT-1 is not applicable to the Project.

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

a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.

b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:

– Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.

– If the NAHC is unable to identify a MLD, or the MLD fails to make a

recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

Applicability to the Project

In the event human remains are encountered during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.91 and 5097.98. If the human remains are of Native American origin, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. Compliance with these state laws, which are equivalent to or more effective than PMM CULT-2, would ensure that no significant impacts to Native American remains would occur. Thus, the PMM CULT-2 is not applicable to the Project.

Impact Analysis

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

No Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines an historical resource as:

1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;

2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or

3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant impact would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic

resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half, and therefore contains no historical resources. The Project Site does not require historic preservation review and is not within a historic preservation overlay zone.[29] ***Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource (on-site or off-site) pursuant to CEQA Guidelines Section 15064.5 and no impact would occur***.

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

The Project Site and surrounding area are not within proximity of a known archaeological site.[30] Furthermore, a records search prepared by the SCCIC did not reveal any prior evaluations of the property. The SCCIC records search revealed that there have been six recorded archaeological resources within half-mile radius of the of the property and none within the Project Site boundaries.[31] Nonetheless, should archaeological resources be discovered during grading or construction activities, work would cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code (PRC) Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

In addition, the City has established a standard mitigation measure to address any inadvertent discovery of archaeological resources, and which would be imposed on the Project as part of its land use approvals.

MM-CUL-1 Inadvertent Discovery of Archaeological Resources

If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

[29] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org. Accessed October 2022.

[30] City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

[31] Letter Correspondence from Stacy St. James, South Central Coastal Information Center, December 1, 2022. Refer to Appendix E to this SCEA.

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;
    - The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and
    - The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. • Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477 CSU Fullerton, 800 North State College Boulevard, Fullerton, CA 92834.
- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

With adherence to MM-CUL-1 regarding the inadvertent discovery of archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5. Impacts would be less than significant.

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

Less Than Significant Impact. A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. As the Project Site has been previously developed, any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.91 and 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. ***Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the cultural resources analysis above. The cumulative impacts cultural resources study area is the extent of the Related Projects.

As discussed above, the Project would not result in a significant impact to cultural resources. The Project Site does not contain any known cultural resources. It is unknown whether or not any of the properties on which the Related Projects are located contain cultural resources. Any related project sites that contain historical, archaeological, or paleontological resources, or human remains would be required to comply with State regulations and measures similar to those that would be required for the Project. Nonetheless, as there are no known cultural resources on the Project Site (see analysis above), there is no potential for the Project to contribute to a cumulative impact. ***Overall, based on the above, cumulative impacts associated with cultural and archaeological resources, tribal cultural resources, and human remains would be less than significant and would not be cumulatively considerable***.

VI. ENERGY

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

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

The 2020–2045 RTP/SCS PEIR MMRP did not identify any mitigation measures required to address impacts associated with Energy.

Impact Analysis

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

Less Than Significant Impact. A significant impact may occur if a project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation.

In order to determine if the Project would result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during the construction or operation of the Project, an analysis of the Project's energy use for all stages of the Project has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following factors that a lead agency may consider in the discussion of energy use:

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.*

In accordance with the considerations above, the following analysis evaluates the potential energy impacts of the Project with a particular emphasis on whether the Project would result in the inefficient, wasteful, or unnecessary consumption of energy. The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during Project construction or operation, or the end of life for the materials and processes that would occur as an indirect result of the Project (i.e. "the energy intensiveness of materials"). Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation are expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Construction

Transportation-Energy

During Project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site. The Project would require demolition and site preparation, including grading and hauling material

offsite; building construction, including installation of landscaping and hardscaping; and architectural coating. As taken from the CalEEMod modeling prepared for the Project, diesel-powered construction equipment (such as off-road equipment and hauling and vendor trucks) would result in 1,476.21 metric tons of carbon dioxide ($MTCO_2$), or 3,255,043.05 pounds of CO_2, while gasoline-powered construction equipment (such as worker automobiles) would result in 1,019.28 $MTCO_2$, or 2,247,512.4 pounds of CO_2.[32] According to CO_2 emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2 and burning one gallon of gasoline produces approximately 19.6 pounds of CO_2.[33] Based on the U.S. Energy Information Administration fuel consumption factors, and the Project's estimated "total CO_2" emissions presented in the CalEEMod output sheets, it is estimated that the Project's construction activities would consume a total of approximately 147,021 gallons of diesel fuel and approximately 114,669 gallons of gasoline. According to fuel sales data from the California Energy Commission, fuel consumption in Los Angeles County was approximately 3.06 billion gallons of gasoline and 445 million gallons of diesel fuel in 2021 (the most recent year of reported data).[34] Accordingly, the Project's transportation-energy consumption during construction would represent a negligible portion of annual gasoline and diesel consumption within Los Angeles County.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. There are no unusual Project characteristics or construction processes proposed that would require the use of equipment that would be more energy intensive and/or less energy efficient than those used for comparable construction projects. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary.

Electricity and Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Electricity use during construction would be temporary and would fluctuate during different phases of construction. However, construction of the Project

[32] See Construction Transportation Energy Worksheet included as Appendix F to this SCEA.

[33] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

[34] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2021. Diesel is adjusted to account for retail (50.3%) and non-retail (49.7%) diesel sales.

would not require electricity to power most construction equipment. The majority of construction equipment during demolition and grading would be gas- or diesel-powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Additionally, it is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. As a result, electrical demand during construction is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Moreover, any electrical use during construction, would replace existing electrical consumption associated with existing Project Site uses that would be removed.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction and construction impacts would be less than significant.

Operation

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and from the Project Site by residents and visitors. Based on the VMT analysis prepared for the Project (see Appendix D of this SCEA), the Project would result in 4,874,940 annual VMT.[35] According to CARB's On-Road Emissions Factor (EMFAC) model, diesel-powered vehicles would account for 4.69 percent of all on-road VMT and would have an average fuel efficiency weighted for percentage of miles traveled of 12 miles per gallon (mpg) in 2025 (the Project's operational year), while gasoline-powered vehicles would account for 88.16 percent of on-road VMT with a fuel efficiency of 26 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles would account for the remaining on-road VMT.[36] Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the Project would consume approximately 19,053 gallons of diesel fuel and 165,298 gallons of gasoline per year.[37] For comparison purposes, according to EMFAC modeling, Los Angeles County on-road

[35] See Appendix F of the Transportation Assessment included as Appendix D to this SCEA. Note that the VMT analysis presents the Project's VMT as 13,356 Daily VMT. 13,356 Daily VMT x 365 days per year = 4,874,940 Annual VMT.

[36] California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See EMFAC Operational Transportation Energy Worksheet in Appendix F to this SCEA.

[37] Calculated as follows for diesel: 4.69 percent of total 4,874,940 VMT = 228,635 diesel VMT / 12 diesel mpg = 19,053 gallons of diesel. Calculated as follows for gasoline: 88.16 percent of total 4,874,940 VMT = 4,297,747 gasoline VMT / 26 gasoline mpg = 165,298 gallons of gasoline.

vehicles would consume 3.54 billion gallons of gasoline and 533 million gallons of diesel in 2025.[38] As such, the fuel usage during Project operation would represent a negligible percent of all annual, on-road fuel-related energy consumption in Los Angeles County.

As detailed in Section XVII, Transportation, the Project would not conflict with transportation plans. The Project's employees, residents, and visitors would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. Additionally, the Project Site's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. The increases in land uses on the Project Site would reduce vehicle trips and VMT by encouraging walking, bicycling, and other non-automotive forms of transportation, which would result in corresponding reductions in transportation energy demand. The Project would also include both short- and long-term bicycle parking spaces as well as electric vehicle charging stations in compliance with LAMC requirements.

Electricity and Natural Gas

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the CalEEMod outputs (see Appendix C of this SCEA), the Project would have an electrical demand of 2,369,404 kilowatt-hours per year (kWh/yr), which has an equivalent instantaneous peak demand of 0.52 megawatts (MW).[39] Electricity would be provided to the Project Site by the Los Angeles Department of Water and Power (LADWP), which projects that its total sales in 2025-2026 fiscal year (the Project's operational year) would be 23,537 gigawatt-hours (GWh).[40] As such, the Project's annual electrical demand would represent 0.01 percent of LADWP's available supplies. In addition, the estimated peak demand on the LADWP system in 2025-2026 is expected to be 6,076 MW.[41] Currently, LADWP has a dependable capacity of 8,009 MW.[42] Therefore, the Project's peak electrical demand would also not exceed LADWP's supply capabilities.

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[38] California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See EMFAC Operational Transportation Energy Worksheet in Appendix F to this SCEA.

[39] Based on a statewide load factor of 52%. Source: California Public Utilities Co., 2017 Report: System Efficiency of California's Electric Grid. page 11, figure 6, visual estimate. Calculated as follows: 2,369,404 kWh/yr annual demand / 365 days/yr = 6,492 kWh/day daily demand / 24 hr/day = 271 kW average load. Using the equation that Load Factor = Average Load / Max Load; the Max Load (aka peak demand) = Average Load (271 kW) / Load Factor (0.52 for California) = 521 kW or 0.52 MW.

[40] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[41] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

[42] Los Angeles Department of Water and Power, About Us, Power, Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?. Accessed October 2022.

CalEEMod outputs (see Appendix C) calculate that the Project would have a natural gas demand of 5,391,542 cubic-feet (cf) per year, or 14,771 cf per day.[43] Natural gas would be provided to the Project Site by Southern California Gas Company (SoCalGas), which projects that natural gas consumption within SoCalGas' planning area will be approximately 2,280 million cf per day out of a total available capacity of 3,435 million cf per day in 2025.[44] The Project's natural gas demand would represent 0.0006 percent of the natural gas consumption within SoCalGas' area and 0.001 percent of the remaining available capacity.

The Project would comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Los Angeles Green Building Code contains mandatory measures for residential and nonresidential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction Projects. Furthermore, the 2022 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation and operational impacts would be less than significant.

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

No Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, the City of LA Green New Deal, and the 2020-2045 RTP/SCS.

Title 24 provides energy conservation standards for all new and renovated commercial buildings constructed in California. The standards apply to the building envelope, space-conditioning

[43] Note that the CalEEMod outputs present the Project's operational natural gas demand as 5,591,029 kilo-British thermal units (kBTU) per year. In 2020, the U.S. annual average heat content of natural gas delivered to consumers was about 1,037 BTU (or 1.037 kBTU) per cubic foot. Source: United States, Energy Information Administration, https://www.eia.gov/tools/faqs/faq.php?id=45&t=8. Project consumption calculated as follows: 5,591,029 kBTU per year / 1.037 kBTU per cubic foot (cf) = 5,391,542 cf per year / 365 days per year = 14,771 cf per day.

[44] California Gas and Electric Utilities, 2022 California Gas Report, Table 32: Southern California Gas Company, Annual Gas Supply and Requirements, Average Temperature Year, page 185.

systems, and water-heating and lighting systems of buildings and appliances and provide guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including: appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The standards also emphasize saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the 2019 CALGreen Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. The City's Green Building Code also includes specific lighting requirements to conserve energy, window gazing to reflect heat, enhanced insulation to reduce heating and ventilation energy use, and enhanced air filtration. As implementation of these conservation policies are mandatory under the City's Building Code, the Project would not conflict with these plans for renewable energy or energy efficiency.

In 2015, the City of Los Angeles adopted and released the City's first ever Sustainable City pLAn, which set short term and longer term energy and conservation targets geared towards advancing the City's economy and equity. The City's 2019 update to the Sustainable City pLAn, known as LA's Green New Deal, focuses on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would cut an additional 30 percent in greenhouse gas emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between now (2021) and 2050.[45] The Project's consistency with the Green New Deal is analyzed in Section VIII, Greenhouse Gas Emissions, of this SCEA. As detailed there, the Project would be consistent with the specific, applicable policies of the Green New Deal.

With regard to transportation energy and consistency with the 2020-2045 RTP/SCS, the Project would support fewer vehicle trips by locating 405 new housing units (and approximately 911 new residents[46]) in a neighborhood that is served by several Metro bus lines, which run bus lines along Sepulveda Boulevard and Vanowen Street. The Project Site is also located within one-mile of the Sepulveda Metro G Line (Orange) Station. Accordingly, as detailed further in Section VIII, Greenhouse Gas Emissions, of this SCEA, the Project would be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

To summarize, the Project would be required to implement features for renewable energy and energy efficiency contained within Title 24, CALGreen, and the City's Green Building Code. In addition, the Project would be consistent with the energy consumption reduction goals of LA's

[45] City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAn 2019, https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf. Accessed October 2022.

[46] Based on rate of 2.25 persons per multi-family dwelling unit (2.25 x 405 = 911). Source: City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1, page 10.

Green New Deal and the 2020-2045 RTP/SCS. **Therefore, the Project would not conflict with a state or local plan for renewable energy or energy efficiency and no impact would occur.**

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the energy analysis above.

Growth within the applicable LADWP and SoCal Gas service areas, as well as County-wide, is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. As discussed above, the Project would not result in a significant impact to energy consumption. Therefore, the Project's individual contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect. ***As such, the Project's impacts would not be cumulatively considerable and cumulative energy impacts would be less than significant***.

VII. GEOLOGY AND SOILS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

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

a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.

b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and

approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; BMPs; and an inspection and monitoring program.

c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

Applicability to the Project

Consistent with PMM GEO-1(a), a Geotechnical Report was prepared for the Project, which includes site-specific measures regarding areas of potential geological risk. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would be required to provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading permits for the Project. In addition, the Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. Compliance with existing regulatory requirements would be equal to or more effective than the measures included in PMM GEO-1, as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Therefore, PMM GEO-1 is not applicable to the Project.

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

a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.

b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.

c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.

d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:

    1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.

    2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.

3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.

4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.

e) Avoid routes and project designs that would permanently alter unique geological features.

f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.

h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.

Applicability to the Project

As analyzed below, no known paleontological resources have been identified at or near the Project Site. Notwithstanding, in the event of the inadvertent discovery of paleontological resources during the Project's grading and excavation period, the Project would be required to comply with all applicable regulatory requirements, which are equal to or more effective than the relevant measures included in PMM GEO-2. Thus, PMM GEO-2 is not applicable to the Project.

Impact Analysis

The following analysis is largely based on the Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California (Geotechnical Report) prepared for the Project by Geocon West, Inc., dated

February 25, 2022, which includes the Soils Report Approval Letter from the City of Los Angeles Department of Building and Safety, dated October 24, 2022.[47]

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

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

Less Than Significant Impact. A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Surface rupture of a fault generally occurs within 50 feet of an active fault line.

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone. According to the California Geological Society, the closest surface trace of an active fault to the Project Site is the Northridge Fault located approximately 3.0 miles to the north. Other nearby active faults are the Verdugo Fault, the Mission Hills segment of the San Fernando Fault Zone, and the Hollywood Fault located approximately 5.2 miles northeast, 5.8 miles north, and 7.9 miles south-southeast of the site, respectively. The active San Andreas Fault Zone is located approximately 31 miles northeast of the Site. The Project Site is not located within a City-designated Fault Rupture Study Area. Thus, the potential for fault rupture at the Project Site would be low. Furthermore, the Project would be required to comply with applicable State and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Report (see Appendix G.1 to this SCEA) that was prepared for the Project. Final design-level soils and geological reports would be submitted to the Los Angeles Department of Building and Safety for review and approval as part of the standard building permit submittal package prior to Project construction.[48] Conformance with current Building Code requirements and site-specific design recommendations in the Geotechnical Report would minimize the potential for people on the Project Site to sustain loss, injury, or death as a result of fault rupture. ***Accordingly, less than significant impacts related to fault rupture would occur under the Project***.

[47] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

[48] Los Angeles Municipal Code Section 91.7006.2 requires the submittal of soils and geological reports to LADBS for review and approval for all grading work in excess of 5,000 cubic yards.

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing 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.

The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. The seismicity of the region surrounding the Project Site was formulated based on research of an electronic database of earthquake data. A partial list of moderate to major magnitude earthquakes that have occurred in the Southern California area within the last 100 years is included in Table 5.6, *List of Historic Earthquakes*.

Table 5.6
List of Historic Earthquakes

Earthquake (Oldest to Youngest)	Date of Earthquake	Magnitude	Distance to Epicenter (Miles)	Direction to Epicenter
Near Redlands	July 23, 1923	6.3	70	E
Long Beach	March 10, 1933	6.4	49	SE
Tehachapi	July 21, 1952	7.5	64	NW
San Fernando	February 9, 1971	6.6	15	NNE
Whittier Narrows	October 1, 1987	5.9	23	ESE
Sierra Madre	June 28, 1991	5.8	26	E
Landers	June 28, 1992	7.3	115	E
Big Bear	June 28, 1992	6.4	93	E
Northridge	January 17, 1994	6.7	5	WNW
Hector Mine	October 16, 1999	7.1	128	ENE
Ridgecrest	July 5, 2019	7.1	119	NNE

Source: Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA.

In addition, several buried thrust faults (those faults without a surface expression) underlie the Los Angeles and are capable of generating significant ground shaking in the Los Angeles Area, including at the Project Site.

The Geotechnical Report prepared for the Project (see Appendix G.1 to this SCEA) provided site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site. The Project would be required through regulatory compliance, including the requirements of LAMC. Section 91.7006.2, to incorporate the recommendations of the Project's geotechnical engineer and with any conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for seismic calculations from probabilistic seismic hazard modeling for the Site. In addition, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its Seismic Design Category as established

in the Geotechnical Report. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code. Accordingly, the Geotechnical Report prepared for the Project concluded that development of the Project is feasible from a geotechnical engineering standpoint, provided that the advice and recommendations contained in the report are included in the Project plans and implemented during construction. ***Therefore, impacts related to seismic ground shaking would be less than significant***.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

The State of California Seismic Hazard Zone Map for the Van Nuys Quadrangle indicates that the Project Site is located within an area designated as having a potential for liquefaction. In addition, the County of Los Angeles Safety Element indicates that the Project Site is located in an area that is identified as having a potential for liquefaction. The historic high groundwater level in the area is reported to be approximately 40 feet beneath the existing ground surface. The Project would be required to comply with applicable State and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Report that was prepared for the Project. Pursuant to LAMC Section 91.7006.2, a final geotechnical report for the Project that addresses the same existing soils conditions as well as the final design of the development would be reviewed and approved by LADBS as part of the City's ministerial processes of issuing grading and building permits. The Project would be required to incorporate the recommendations of the Geotechnical Report and regulatorily required to comply with all conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for underlying soil conditions, including liquefaction potential. ***Therefore, impacts related to liquefaction, would be less than significant and no mitigation measures would be required***.

iv. Landslides?

No Impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding.

The topography at the Project Site is flat. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability. There are no known landslides near the site, nor is the Project Site in the path of any known or potential landslides. Furthermore, the Project does not propose substantial alterations to the existing topography that would directly or indirectly cause adverse effects related to landslides. Accordingly, the Geotechnical Report (see Appendix G.1 to this SCEA) concluded that the Project would not be subject to hazards related to landslides and that development of the Project would be feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the report are included in the Project plans and are implemented during construction. ***Therefore, no impacts related to landslides would occur***.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

During construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion is unlikely to occur. All grading activities require permits from the LADBS, which reviews compliance with requirements and standards designed to limit potential impacts, including from erosion to acceptable levels. In addition, all on-site grading and Project Site preparation is required to comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan for the Project would conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

During construction, the Project would be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate BMPs. Appropriate erosion control and drainage devices per the LAMC Section 91.7013 would be provided to the satisfaction of the Los Angeles Department of Building and Safety. During operation, the Project Site would be entirely covered with the structure and minor amounts of landscaping and there would be no exposed soil that would be susceptible to erosion. Accordingly, the Project would not have the potential to result in substantial soil erosion or the loss of topsoil. ***Impacts would be less than significant***.

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

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated in Sections 6(a)(iii) and (iv) above.

The Project Site is underlain by Quaternary age alluvial deposits consisting of fine-grained clay, silt and sand. Artificial fill was encountered in the subsurface explorations to maximum depth of 2 to 5½ feet. The artificial consists of light brown to dark brown or yellowish brown sandy silt and silty sand that can be characterized as soft to firm or loose to medium dense, and dry to slightly moist. The fill is likely the result of past grading or construction activities at the Site. Deeper fill may exist between excavations and in other portions of the Project Site that were not directly explored.

The artificial fill is underlain by Quaternary age alluvium. The alluvium generally consists of yellowish brown, olive brown, and light brown to dark brown interbedded poorly graded and well-graded sand, silty sand, sandy silt and clay with varying amounts of gravel. The alluvial soils are characterized as dry to moist and loose to very dense or soft to hard.

The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site.

The topography at the Project Site is relatively level, with no pronounced highs or lows. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area. Also, the Project Site is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Site, nor is the site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low.

In addition, safe construction practices would be exercised through required compliance with the City Building Code, the Geotechnical Report's recommendations, and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to site conditions and soil conditions, including soil stability. The Geotechnical Report prepared for the Project (see Appendix G.1 to this SCEA) concluded that the Project would not be subject to hazards related to instability, such as settlement, slippage, or landslide provided that the recommendations contained in the Geotechnical Report are followed and implemented during design and construction. ***Therefore, impacts related to instability would be less than significant.***

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Subsurface exploration conduction as part of the Geotechnical Report (see Appendix G.1 to this SCEA) determined that the soils beneath the Project Site are artificial fills that were encountered at a maximum depth of 2 to 5½ feet below existing ground surface. The Project Site is underlain

by fill soil and older alluvium. The artificial consists of light brown to dark brown or yellowish brown sandy silt and silty sand that can be characterized as soft to firm or loose to medium dense, and dry to slightly moist. The fill is likely the result of past grading or construction activities at the Site. Deeper fill may exist between excavations and in other portions of the Project Site that were not directly explored.

The artificial fill is underlain by Quaternary age alluvium. The alluvium generally consists of yellowish brown, olive brown, and light brown to dark brown interbedded poorly graded and well-graded sand, silty sand, sandy silt and clay with varying amounts of gravel. The alluvial soils are characterized as dry to moist and loose to very dense or soft to hard.

The on-site geologic materials are in the low expansion range. The Expansion Index was found to be between 30 and 33 for bulk samples taken from a depth of one to five feet below ground surface. Furthermore, the Project would be required to comply with the City of Los Angeles Uniform Building Code, the LAMC, and other applicable building codes which include building foundation requirements appropriate to Site-specific conditions, such as expansion potential, established in the Geotechnical Report, and any conditions or recommendations established for the Project by the LADBS during their review of Project plans and the Geotechnical Report as part of the building and grading permit approval process (pursuant to LAMC Section 91.7006.2). ***Therefore, impacts from expansive soil would be less than significant***.

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

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Therefore, no septic tanks or alternative disposal systems would be necessary, nor are they proposed. ***Accordingly, no impacts related to inadequate septic tank support would occur***.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature.

Geologic Features

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features and no impacts would occur.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located in a developed, urban area that has been previously subject to disturbance, including grading and development. Per the General Plan Framework EIR, there are no known paleontological resources within the Project Site.[49] Additionally, a Vertebrate Paleontology Records Check was conducted by the Los Angeles County Natural History Museum for paleontological resources on the Project Site and vicinity. The research did not find any recorded paleontological resources within the Project Site boundaries. The research did find that there are localities of resources nearby from the same sedimentary deposits occurring at depth in the Project Area.[50] As outlined in the paleontological records search, the closest known vertebrate fossil locality to the Project Site is LACM 3822, approximately one-mile, which was collected from an unnamed lacustrine deposit 75 to 100 feet below ground surface and produced Bison. Therefore, as the Project would require excavation for subterranean parking, utility and foundation work, and grading there would be a potential to encounter buried paleontological resources.

The Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources that may be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources."[51] The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, with adherence to applicable regulatory measures, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. ***Overall, the Project would not directly or indirectly destroy a unique geologic feature and, with adherence to all regulatory requirements, would not directly or indirectly destroy a unique paleontological resource. Thus, impacts would be less than significant***.

[49] City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles.

[50] Correspondence from Alyssa Bell, Ph.D., Natural History Museum of Los Angeles County, October 2, 2022. Refer to Appendix H to this SCEA.

[51] City of Los Angeles, General Plan, Conservation Element, Adopted September 26, 2001. Page II-5.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the geology and soils analysis above, including seismicity, landslides, loss of topsoil, soil stability, fault rupture, etc. Geological hazards are site-specific and there is little, if any, cumulative relationship between a project and other nearby projects. Nonetheless, cumulative development in the Project vicinity would increase the overall population in the area, thus, increasing the risk of exposure to seismically induced hazards. With adherence to applicable local, State, and federal regulations, building codes, and comprehensive engineering practices, geologic hazards would be less than significant. Furthermore, the analysis of the Project's geology and soils impacts (see analysis above) concluded that with compliance with existing State and City building codes and City grading plan check requirements, impacts would be less than significant. ***Therefore, cumulative impacts would be less than significant***.

VIII. GREENHOUSE GAS EMISSIONS

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

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:

i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.

ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.

iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.

iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.

v. Use high-efficiency lighting and cooking devices.

vi. Incorporate passive solar design.

vii. Use high-reflectivity building materials and multiple glazing.

viii. Prohibit gas-powered landscape maintenance equipment.

ix. Install electric vehicle charging stations.

x. Reduce wood burning stoves or fireplaces.

xi. Provide bike lanes accessibility and parking at residential developments.

b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.

c) Include off-site measures to mitigate a project's emissions.

d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:

i. Use energy and fuel-efficient vehicles and equipment;

ii. Deployment of zero- and/or near-zero-emission technologies;

iii. Use lighting systems that are energy efficient, such as LED technology;

iv. Use the minimum feasible amount of GHG-emitting construction

materials;

v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;

vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;

viii. Incorporate design measures to reduce water consumption;

ix. Use lighter-colored pavement where feasible;

x. Recycle construction debris to maximum extent feasible;

xi. Plant shade trees in or near construction projects where feasible; and

xii. Solicit bids that include concepts listed above.

e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:

i. Promote transit-active transportation coordinated strategies;

ii. Increase bicycle carrying capacity on transit and rail vehicles;

iii. Improve or increase access to transit;

iv. Increase access to common goods and services, such as groceries, schools, and day care;

v. Incorporate affordable housing into the project;

vi. Incorporate the neighborhood electric vehicle network;

vii. Orient the project toward transit, bicycle and pedestrian facilities;

viii. Improve pedestrian or bicycle networks, or transit service;

ix. Provide traffic calming measures;

x. Provide bicycle parking;

xi. Limit or eliminate park supply through;

xii. Elimination (or reduction) of minimum parking requirements

xiii. Creation of maximum parking requirements

xiv. Provision of shared parking.

xv. Unbundle parking costs;

xvi. Provide parking cash-out programs;

xvii. Implement or provide access to commute reduction program.

f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;

g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and

h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:

i. Provide car-sharing, bike sharing, and ride-sharing programs;

ii. Provide transit passes;

iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;

iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;

v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;

vi. Provide employee transportation coordinators at employment sites;

vii. Provide a guaranteed ride home service to users of non-auto modes.

i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;

j) Land use siting and design measures that reduce GHG emissions, including:

   i. Developing on infill and brownfields sites;

   ii. Building compact and mixed-use developments near transit;

   iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;

   iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and

   v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.

l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.

m) Encourage telecommuting and alternative work schedules, such as:

   i. Staggered starting times

   ii. Flexible schedules

   iii. Compressed work weeks

n) Implement commute trip reduction marketing, such as:

   i. New employee orientation of trip reduction and alternative mode options

   ii. Event promotions

   iii. Publications

o) Implement preferential parking permit program

p) Implement school pool and bus programs

q) Price workplace parking, such as:

   i. Explicitly charging for parking for its employees;

   ii. Implementing above market rate pricing;

   iii. Validating parking only for invited guests;

   iv. Not providing employee parking and transportation allowances; and

   v. Educating employees about available alternatives.

Applicability to the Project

As analyzed below, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) that would be equivalent to and as effective as the measures included in PMM GHG-1.

- The Project would integrate green building measures consistent with CALGreen (California Building Code Title 24). Specifically, the Project would comply with 2019 or better Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the standards are "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." As discussed above in Subsection 3.3.7, the Project would include highly efficient HVAC systems; energy-efficient wall insulation and glazing units; and Energy Star–labeled appliances, or equivalent rating as may be applied at the time of construction. Furthermore, all exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology (See Subsection 3.3.5). The Project would also set aside a minimum area for potential

installation of solar panels on residential and non-residential buildings at a later date as required by Title 24.

- The Project would comply with the City's EV charging requirements, which specify that five percent of new parking spaces would require EV charging equipment. In addition, 20 percent of all new parking spaces would be required to be EV "ready," which would be capable of supporting future EV charging equipment.

- Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.

- The Project would comply with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[52] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

- The Project would comply with applicable regulations regarding water conservation, including, the Los Angeles Green Building Code and CALGreen.

In addition, to the above regulatory compliance measures, the Project would also include TDM strategies, as outlined in Project Design Feature TR-PDF-1. These TDM strategies include the provision of bicycle parking and reduced parking and would reduce reliance on motor vehicles which serves to reduce emissions.

The Project would adhere to existing regulatory requirements regarding GHG emissions and TR-PDF-1, which are equivalent to or as effective as PMM GHG-1 in reducing substantial adverse effects related to GHG emissions. As such, PMM GHG-1 is not applicable to the Project.

Impact Analysis

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

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

[52] Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

Less than Significant Impact.

Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

To analyze the Project's GHG impacts under Appendix G thresholds, the City will utilize a qualitative analysis that will assess the Project's consistency with applicable plans, policies, and regulations adopted to reduce GHG emissions, discussed below. Additionally, to comply with the requirements of CEQA Guidelines, section 15064.4(a), the analysis includes a good faith estimate of GHG emissions that may result from the project.

CEQA Guidelines Section 15064.4 provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. Lead agencies should consider several factors when determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether a project exceeds a significance threshold that the lead agency determines applies to the project; and the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).[53] It is noted that the CEQA Guidelines were amended in response to SB 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions. Because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. The Climate Change Scoping Plan approved by the California Air Resources

[53] See, generally, Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

Board; the City's LA Green Plan; and Sustainable City pLAn all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill (AB) 32) and the Global warming Solutions Act (also known as Senate Bill (SB) 32). Thus, the Lead Agency has determined that the Project would not have a significant effect on the environment if the Project is found to be consistent with AB 32/SB 32 and SB 375 (through demonstration of conformance with the 2020–2045 RTP/SCS) and the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 Climate Change Scoping Plan, and the Sustainable City pLAn/L.A.'s Green New Deal.

However, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

Analysis of GHG Emissions

The Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water/wastewater, and construction equipment. The following provides the methodology used to calculate the Project-related GHG emissions and the Project impacts.

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. CalEEMod Version 2022.1 was used to calculate the GHG emissions from the Project. The CalEEMod Output for year 2025 for the Project is available in Appendix C, of this SCEA. Each source of GHG emissions is described in greater detail below.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. The Project will comply with SCAQMD Rule 1113. SCAQMD Rule 1113 states that paints applied to building envelope are limited to 50g/L VOC content. No changes were made to the default area source emissions.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.[54]

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the Project. The vehicle trips associated with the Project have been analyzed based on the Project-specific trip generation rates and VMT data. As discussed in Section XVII of this SCEA, the Project would generate a total of 1,717 daily trips/13,356 daily VMT with incorporation of project design feature-based TDM measures. Based on the data in the Traffic Study, with incorporation of PDF-based TDM measures, the Project would not result in any significant VMT transportation impacts.

Emissions of GHGs associated with mobile sources from operation of the Project are based on the average daily trip rate, trip distance, the GHG emission factors for the mobile sources, and the Global Warming Potential (GWP) values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the SCAB as provided in EMFAC2021 and CalEEMod.

Waste

Waste includes the GHG emissions generated from the processing of waste from the Project as well as the GHG emissions from the waste once it is interred into a landfill. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[55] AB 341 requires that 75 percent of waste be diverted from landfills by 2020. It is anticipated that the Project would recycle at least 50 percent of its solid waste; however, to be conservative, no reductions were taken. No changes were made to the default waste parameters.

Water/Wastewater

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. The Project is required to comply with CALGreen which mandates a 20 percent reduction in indoor water usage; however, to be conservative, no reductions were taken. No changes were made to the default water usage parameters.

[54] No changes were made to the CalEEMod default energy use settings. The baseline for the current CalEEMod energy use defaults is 2019 Title 24 Standards. However, if the Project is permitted after January 2023, then it will be subject to 2022 Title 24 Standards.

[55] City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.

Construction

The construction-related GHG emissions were also included in the analysis and were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The construction-related GHG emissions were calculated by CalEEMod.

The GHG emissions have been calculated based on the parameters as described in Section III above. A summary of the results is shown below in Table 5.7, *Project-Related GHG Emissions*, and the CalEEMod Model run for the Project is provided in Appendix C of this SCEA. Table 5.7 shows that Project's total emissions would be 3,040.27 $MTCO_2e$ per year.

Table 5.7
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Maximum Annual Operations	2,957
Construction Emissions	83.27
Project Total	**3,040.27**
Calculation sheets are provided in Appendix C of this SCEA. *Source: CalEEMod Version 2022.1 for Opening Year 2025.*	

As stated above, because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment as outlined below.

For informational purposes, the above emissions estimate shows that the Project would generate incrementally increased GHG emissions over existing conditions. However, the determination of significance of the Project's impact is based on Project's consistency with Executive Order S-3-05 and AB 32, Executive Order B-30-15, SB 32, the CARB Scoping Plan (2022 and 2017 Scoping Plans), the City of Los Angeles Green New Deal and Sustainable City pLAn, the City of Los Angeles Green Building Ordinance, and the SCAG's 2020-2045 RTP/SCS discussed below.

Consistency with Applicable GHG Emissions Reduction Plans

As discussed below, the Project would be consistent with the 2020–2045 RTP/SCS, the Climate Change Scoping Plan, and the Sustainable City pLAn/L.A.'s Green New Deal. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of project design features discussed in other sections of this SCEA, would minimize the Project's GHG emissions.

Consistency with CARB Scoping Plans and Updates

Emission reductions in California alone would not be able to stabilize the concentration of greenhouse gases in the earth's atmosphere. However, California's actions set an example and drive progress towards a reduction in greenhouse gases elsewhere. If other states and countries were to follow California's emission reduction targets, this could avoid medium or higher ranges of global temperature increases. Thus, severe consequences of climate change could also be avoided.

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. The goal of Executive Order S-3-05, to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed below in Table 5.8, *Project Consistency with CARB Scoping Plan Policies and Measures*, is consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required.

CARB Board approved a Climate Change Scoping Plan in December 2008. The Scoping Plan outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. The Scoping Plan "proposes a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health" (California Air Resources Board 2008). The measures in the Scoping Plan have been in place since 2012. This Scoping Plan calls for an "ambitious but achievable" reduction in California's greenhouse gas emissions, cutting approximately 30 percent from business-as-usual emission levels projected for 2020, or about 10 percent from today's levels. On a per-capita basis, that means reducing annual emissions of 14 tons of carbon dioxide for every man, woman and child in California down to about 10 tons per person by 2020.

In addition, on May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan (CARB's First Update).[56] CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent required by applicable by law.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (Cleveland National). The case arose from San Diego

[56] California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014; https://ww2.arb.ca.gov/sites/default/files/classic//cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

Association of Governments (SANDAG's) adoption of its 2050 Regional Transportation Plan, which included its Sustainable Communities Strategy, as required by SB 375. On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, since the Project is much smaller in size and scope in comparison to the Regional Transportation Plan examined in Cleveland National, assessing the Project's consistency with regard to the 2050 target of Executive Order S-3-05 is not necessary for determining compliance with CEQA.

In November 2017, CARB released the 2017 Scoping Plan. This Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts and identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the State's 2030 GHG limit. The 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and Trade Program, which constrains and reduces emissions at covered sources. Independent studies confirm CARB's determination that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[57] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated 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 studies would allow the state to meet the 2050 target.

Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively, the 2050 target of Executive Order S-3-05 has not been codified, so the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the

[57] Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). 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 percent 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. https://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf.

aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022. The 2022 Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The Plan addresses recent legislation and direction from Governor Newsom and extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

As the latest, 2022 Scoping Plan builds upon previous versions, project consistency with applicable strategies of both the 2008, 2017, and 2022 Plan are assessed in Table 5.8, *Project Consistency with CARB Scoping Plan Policies and Measures*. As shown in Table 5.8, *Project Consistency with CARB Scoping Plan Policies and Measures*, the Project would not conflict with any of the previous versions of the Scoping Plan or the 2022 Scoping Plan elements, as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show

that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.[58]

Table 5.8
Project Consistency with CARB Scoping Plan Policies and Measures
(2008, 2017 and 2022)

2008 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	Project Compliance with Recommended Action
California Light-Duty Vehicle Greenhouse Gas Standards – Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**No conflict.** These are CARB enforced standards for vehicles. To the extent applicable, vehicles that access the Project, will comply.
Energy Efficiency – Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**No conflict.** The Project will be compliant with the current Title 24 standards and Green Building Code standards.
Low Carbon Fuel Standard – Develop and adopt the Low Carbon Fuel Standard.	**No conflict.** These are CARB enforced standards for vehicles. To the extent applicable, vehicles that access the Project will comply.
Vehicle Efficiency Measures – Implement light-duty vehicle efficiency measures.	**No conflict.** These are CARB enforced standards for vehicles. To the extent applicable, vehicles that access the Project, will comply.
Medium/Heavy-Duty Vehicles – Adopt medium and heavy-duty vehicle efficiency measures.	**No conflict.** These are CARB enforced standards for vehicles. To the extent applicable, vehicles that access the Project will comply.
Green Building Strategy – Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**No conflict**. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2019 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The Project will be subject to these mandatory standards.
High Global Warming Potential Gases – Adopt measures to reduce high global warming potential gases.	**No conflict.** CARB identified five measures that reduce HFC emissions from vehicular and commercial refrigeration systems. To the extent applicable, vehicles that access the Project will comply with the strategy. The Project is 100%

[58] California Legislative Information, Senate Bill No. 32, [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.

Table 5.8
Project Consistency with CARB Scoping Plan Policies and Measures
(2008, 2017 and 2022)

2008 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	Project Compliance with Recommended Action
	residential and will not include commercial systems.
Recycling and Waste – Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**No conflict.** The state is currently developing a regulation to reduce methane emissions from municipal solid waste landfills. The Project will be required to comply with City programs, such as City's recycling and waste reduction program, which comply with the 75 percent reduction required in 2020 per AB 341.
Water – Continue efficiency programs and use cleaner energy sources to move and treat water.	**No conflict.** The Project will comply with all applicable City ordinances and CAL Green requirements.
2017 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	**Project Compliance with Recommended Action**
Implement Mobile Source Strategy: Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Car regulations.	**No conflict.** These are CARB enforced standards. To the extent applicable, vehicles that access the Project will comply with the strategy.
Implement Mobile Source Strategy: At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025 and at least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.	**No conflict.** These are CARB enforced standards. To the extent applicable, vehicles that access the Project will comply with the strategy.
Implement Mobile Source Strategy: Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_X standard.	**No conflict.** These are CARB enforced standards. To the extent applicable, vehicles that access the Project will comply with the strategy.
Implement Mobile Source Strategy: Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	**No conflict**. These are CARB enforced standards. To the extent applicable, vehicles that access the Project will comply with the strategy.

Table 5.8
Project Consistency with CARB Scoping Plan Policies and Measures
(2008, 2017 and 2022)

2008 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	Project Compliance with Recommended Action
Implement SB 350 by 2030: Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**No conflict.** The Project will be compliant with the current Title 24 standards and Green Building Code.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**No conflict.** The Project will be required to comply with City programs, such as City's recycling and waste reduction program, which comply with the 75 percent reduction required by 2020 per AB 341.
2022 Scoping Plan Priority Key Actions and Recommendations	**Project Compliance with Recommended Action**
100 percent of light-duty vehicle sales are ZEVs by 2035.	**Not Applicable**. This action is in regard to vehicle sales, with an aim to have 100 percent of light-duty vehicle sales be ZEVs by 2035. The Project is a residential use and would not interfere with such policymaking. Furthermore, although this action is not necessarily applicable on a project-specific basis, the Project is designed so that 30 percent of the parking spaces would be pre-wired for electric vehicle charging. Of these parking spaces, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles. The Project would provide a total of 194 bicycle parking spaces (176 long-term and 18 short-term spaces). and would adhere to the City's regulations regarding the number of electric vehicle parking spaces required.
VMT per capita reduced 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.	**No Conflict**. The Project would not result in an unmitigated impact to VMT. The Project is a residential urban center/infill development located in close proximity to transit. Therefore, the Project would be anticipated to contribute to a reduction in VMT per capita.
All electric appliances in new construction beginning 2026 (residential) and 2029 (commercial).	**No Conflict.** The Project will comply with the Green Building Code standards and use electric appliances as applicable.
For existing residential buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035 (appliances replaced at end of life). For existing commercial buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2045 (appliances replaced at end of life)	**Not Applicable**. This action is in regard to appliance sales. The Project is a residential building that will be constructed before 2030 and will incorporate electric appliances as applicable, and would not interfere with such policymaking. Furthermore, although this action is not necessarily applicable on a project-specific basis, the Project is subject to the California Green Building Standards Code (proposed Part 11, Title 24) which was adopted as part of the California Building Standards Code in the CCR. Part 11

Table 5.8
Project Consistency with CARB Scoping Plan Policies and Measures
(2008, 2017 and 2022)

2008 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	Project Compliance with Recommended Action
	establishes voluntary standards, that are mandatory in the 2019 and 2022 editions of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. In addition, the 2022 edition of the Code took effect January 1, 2023. The project will be subject to these mandatory standards.
Source: CARB Scoping Plan (2008, 2017, and 2022)	

As shown in Table 5.8 above, the Project is consistent with the applicable strategies of the CARB Scoping Plan and would result in a less than significant impact. Therefore, the Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

LA Sustainable City pLAn

The Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The 2019 L.A. New Green Deal is the first four-year update to the Sustainable City pLAn (Sustainable City pLAn/LA Green New Deal). It augments, expands, and elaborates in more detail the City's vision for a sustainable future and it addresses the climate emergency with accelerated targets and new aggressive goals. The Project would contribute towards the attainment of the aspirations and goals previously identified in the Regulatory Framework discussion above by:

- Obtaining power from a utility provider that supplies 55% renewable energy by 2025.
- Including components that will reduce building energy use per square foot 22% by 2025.
- Reducing Vehicle Miles Traveled per capita by at least 13% by 2025.
- Ensuring 57% of new housing units are built within 1,500 feet of transit.

The proposed Project would use energy from the Los Angeles Department of Water and Power (LADWP), which currently provides 34 percent of electricity via renewable sources but has committed to providing an increasing percentage from renewable sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The

Project would be designed and constructed to meet LA Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The Project would include Energy Star® appliances where applicable and would be a modern development with energy efficient heaters and air conditioning systems. As such, the Project would be consistent with the goals and initiatives in the Sustainable City pLAn/L.A. Green New Deal.

A discussion of the Project's consistency with the Sustainable City pLAn/L.A. Green New Deal targets is provided below in Table 5.9, *Project Consistency with the Sustainable City pLAn/ L.A. Green New Deal*.

Table 5.9
Project Consistency with the Sustainable City pLAn/ L.A. Green New Deal

Targets	Project Consistency
Local Water. 20% reduction in water use per capita by 2017; 22.5% by 2025; and 25% by 2035.	**No conflict**. The Project would be consistent with the LAMC to reduce water consumption by 20 percent. The Project is required to follow CALGreen Standards which mandates a 20 percent reduction in indoor water use.
Solar Power. Increase cumulative total megawatts of local solar photovoltaic power to between 900-1,500 megawatts by 2025 and 1,500 to 1,800 megawatts by 2035 as well as increasing the cumulative total megawatts of energy storage capacity to at least 1,654 to 1,750 megawatts by 2025.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. The Project would include, but not be limited to: air-tight and insulated envelope, low-E windows, low-water use plumbing fixtures, low-water use landscaping and weather sensor-controlled drip irrigation, and solar thermal or photovoltaic systems.
Energy Efficient Buildings. Reduce energy use per square foot below 2013 baseline levels for all building types by at least 14% by 2025 and 30% by 2035 and use energy efficiency to deliver 15% of all of the City's projected electricity needs by 2020.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. Project would include, but not be limited to: air-tight and insulated envelope, low-E windows, low-water use plumbing fixtures, low-water use landscaping and weather sensor-controlled drip irrigation, and solar thermal or photovoltaic systems.
Carbon and Climate Leadership. Reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. Improve GHG efficiency of the City from 2009 levels by 55 percent by 2025 and 75 percent by 2035.	**No conflict.** The Project would be designed to incorporate energy and water efficient design that meet or exceed the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code standards and incorporate energy and water efficiency measures. The Project includes design features and compliance with Code measures that will assist in the reduction of Project-related GHG emissions. Some of these design features include: air-tight and insulated envelope, low-E windows, low-water use plumbing fixtures, low-water use landscaping and weather sensor-controlled drip irrigation, MERV 13 filtration, and solar thermal or photovoltaic systems. Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles. The Project would provide a total of 194 bicycle parking spaces (176 long-term and 18 short-term spaces).

Table 5.9
Project Consistency with the Sustainable City pLAn/ L.A. Green New Deal

Targets	Project Consistency
Waste and Landfills. Increase land fill diversion rates to at least 90 percent by 2025 and 95 percent by 2035, as well as increasing proportion of waste products and recyclable commodities productively reused and repurposed within the County of Los Angeles to at least 25 percent by 2025 and 50 percent by 2035.	**No conflict**. The Project would be required to implement recycling programs that reduce waste to landfills by a minimum of 75 percent (per AB 341). 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 citywide recycling targets. The Project would also comply with the City of Los Angeles Space Allocation Ordinance (171,687) which requires that developments include a recycling area or a room of a specified size on the Project Site.
Housing and Development. Increase cumulative new housing unit construction to 100k by 2021, 150k by 2025, and 275k by 2035. Ensure proportion of new housing units built within 1,500 feet of transit is at least 57 percent by 2025 and 65 percent by 2035.	**No conflict.** The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the facility.
Mobility and Transit. Reduce daily VMT per capita by at least 5 percent by 2025 and 10 percent by 2035. Increase the percentage of all trips made by walking, biking, or transit to at least 35 percent by 2025 and 50 percent by 2035.	**No conflict.** The Project is an urban center/infill development located in close proximity to transit. The Project Site is located on Sepulveda Boulevard and is served by several bus lines, including, Metro Bus Line 234 (which is a consolidation of Bus Lines 234 and 734) on Sepulveda Boulevard, and Metro Bus Line 165 on Vanowen Street. Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles. The Project would provide a total of 194 bicycle parking spaces (176 long-term and 18 short-term spaces) located and configured in compliance with applicable requirements of the LAMC. In addition, the Project would improve the pedestrian environment around the perimeter of the Project Site by providing new landscaping and crosswalks.
Air Quality. Increase the percentage of electric and zero emissions vehicles in the city to 10 percent by 2025 and 25 percent by 2035 as well as increasing the percentage of port-related goods movement trips that use zero-emissions technology to at least 15 percent in 2025 and 25 percent in 2035.	**No conflict**. The Project would comply with applicable City of Los Angeles Building Codes pertaining to building code requirements for charging station prewiring and installation of charging stations. Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles.

Note: This analysis focuses on the Sustainable City pLAn/L.A. Green New Deal targets most applicable to the Project.
Source: City of Los Angles Sustainable City pLAn, April 2015 and L.A.'s Green New Deal Sustainable City pLAn 2019.

The analysis above describes the consistency of the Project with the City's Sustainable City pLAn/L.A. Green New Deal. As discussed in Table 5.8 and Table 5.9, generally the Project's consistency with the plans and policies should be demonstrated by a combination of regulatory compliance (green building code etc.) as well as Project-specific characteristics (water conservation, energy conservation, and other features consistent with these plans). Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for the reduction of GHG emissions.

LA Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2020, comply with the current Los Angeles Green Building Code as amended to comply with the 2019 CALGreen Code; project filed on or after January 1, 2023, will need to comply with the 2022 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include, but are not limited to: air-tight and insulated envelope, low-E windows, low-water use plumbing fixtures, low-water use/drought-tolerant landscaping and weather sensor-controlled drip irrigation, MERV 13 filtration, and solar thermal or photovoltaic systems. Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, 11.3 percent of the total number of parking spaces would have chargers for electric vehicles. The Project would provide a total of 194 bicycle parking spaces (176 long-term and 18 short-term spaces). The Project will comply with the City of Los Angeles' Green Building Ordinance standards and reduce emissions beyond a "Business-as-Usual" scenario.

2020-2045 RTP/SCS

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016-2040 RTP/SCS on April 7, 2016.[59, 60] On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020– 2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[61] Applicable Goals and Guiding Principles of the 2020-2045 RTP/STS include:

- Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Enhance the preservation, security, and resilience of the regional transportation system.
- Increase person and goods movement and travel choices within the transportation system.
- Reduce greenhouse gas emissions and improve air quality

[59] Southern California Association of Governments, Final 2016-2040 RTP/SCS.

[60] Southern California Association of Governments, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance off GHG Quantification Determination, June 2016.

[61] SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

- Support health and equitable communities.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS.

Consistent with SCAG's 2020–2045 RTP /SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand. The Project Site is located within a TPA. As discussed previously, the Project Site is an urban center location close to jobs, off-site housing, shopping, and entertainment uses and in close proximity to 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. The 2020-2045 RTP/SCS projects that these urban center/infill areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020-2045 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- New, approximately 268,770 square foot residential building;
- Jobs closer to transit;
- New job growth focused in TPA; and
- Biking and walking infrastructure to improve active transportation options and transit access.

Further, the vertical integration of land uses on the Project Site would produce substantial reductions in auto mode share to and from the Project Site that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the 2020-2045 RTP/SCS. Additionally, the proposed electric vehicle charging infrastructure would support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Project would be located in an area well-served by public transit. Specifically, Project Site is served by a variety of public transit options, including Metro Bus Lines 234 on Sepulveda Boulevard, and Metro Bus Line 165 on Vanowen Street; and the Sepulveda Metro G Line (Orange) Station, located approximately 1.0 mile south of the Project Site. Metro Bus Line 234 is

identified as a part of Metro's NextGen Bus Plan as a bus line that would be improved with increased frequency and service operation. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the area. The Project would not conflict with 2020-2045 RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

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

The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Project-specific impacts with respect to GHG emissions would be less than significant, and no mitigation is required.

Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant. Thus, impacts relative to GHG Threshold (a) and GHG Threshold (b) would be less than significant.

Cumulative Impacts

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. Therefore, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[62] The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change.

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

The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Consistent with CEQA Guidelines Section 15064h(3),[63] the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce GHG emissions.

As discussed above, the Project is consistent with the CARB Scoping Plan, SCAG's 2020-2045 RTP/SCS, and Sustainable City pLAn/L.A.'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 the emissions of GHGs. ***For these reasons, the contribution of the project to the cumulative effect of global climate change is not considered to be cumulatively considerable***.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐

[63] The State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program 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 will 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. 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. 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."

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.

b) Specify Project requirements for interim storage and disposal of

hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:

   – The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. and ensure notification in the event the Coroner is not available.

   – The location of such hazardous materials.

   – An emergency response plan including employee training information.

   – A plan that describes the way these materials are handled, transported and disposed.

d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.

e) Avoid overtopping construction equipment fuel gas tanks.

f) Properly contain and remove grease and oils during routine maintenance of construction equipment.

g) Properly dispose of discarded containers of fuels and other chemicals.

h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.

i) Identify and implement more stringent tank car safety standards.

j) Improve rail transportation route analysis, and modification of routes based on that analysis.

k) Use the best available inspection equipment and protocols and implement positive train control.

l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.

m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.

n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.

o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.

p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.

q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

Applicability to the Project

As analyzed below, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. Regardless, consistent with PMM HAZ-1, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation, and the Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Adherence to existing regulations by the Project would be equal to or more effective than PMM HAZ-1. Therefore, PMM HAZ-1 is not applicable to the Project.

PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards

related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;

b) More stringent tank car safety standards;

c) Improved rail transportation route analysis, and modification of routes based on that analysis;

d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;

e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;

f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;

g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;

h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.

Applicability to the Project

PMM HAZ-2 includes measures regarding the transport of hazardous materials. No significant impacts are anticipated in relation to the transport of such materials. However, consistent with PMM HAZ-2, appropriate hazardous materials management protocols would be implemented at the Project Site as required by applicable regulations during construction and operation. The Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, which are equal to or more effective that PMM HAZ-2 and therefore, PMM HAZ-.2 is not applicable to the Project.

PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.

b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

Applicability to the Project

Although the Project is located within one-quarter mile of a school, the Project would not emit or handle hazardous materials in. As such, PMM HAZ-3 is not applicable to the Project.

PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.

b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.

c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.

d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.

e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.

f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.

g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.

h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.

i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled

(sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.

j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.

k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.

l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.

m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.

n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.

o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the

stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Applicability to the Project

Consistent with PMM HAZ-4, a Phase I ESA was prepared for the Project. Incorporation of Project Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which consist of site-specific measures recommended in the Phase I ESA prepared for the Project, would ensure that impacts would be reduced to less than significant levels. Furthermore, the Project would implement all applicable hazardous materials management protocols and would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Regulatory compliance and implementation of Project-specific Mitigation Measures would be equivalent to and more effective that PMM HAZ-4, and as such, PMM HAZ-4 is not applicable to the Project.

PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.

b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;

c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.

Applicability to the Project

Consistent with this measure, the Project would implement Project Design Feature TR-PDF-2, which, consistent with current and standard City policy, would require the preparation of and City approval of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDF-2 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-5. As such, PMM HAZ-5 is not applicable to the Project.

Impact Analysis

The following analysis is based, in part, on the Phase I, Environmental Site Assessment Report for 6728 Sepulveda Boulevard (Phase I ESA) prepared by Citadel EHS, dated May 20, 2022, and the Limited Phase II Soil Vapor Sampling Services Report (Phase II) prepared by Citadel EHS, dated March 10, 2021, and which are both included as Appendix I of this SCEA.

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction

Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban development project. All of these materials would be used temporarily during construction. Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Construction activities would be contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Operation

Operation of the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a mixed-use building with residential uses and ground floor commercial uses. These typical urban uses do not involve the routine use of hazardous materials**.** Instead, the operation of the Project has limited hazardous materials that are similar to any other urban development such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's uses could include commercial-grade cleaning solvents,

waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. As a result, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Therefore, operation of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. The Project would be required to comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. ***Therefore, impacts related to the transport, use, and disposal of hazardous materials would be less than significant***.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

As stated above, a Phase I ESA was conducted for the Project Site in May 2022 (Appendix I.1 of this SCEA). The Phase I ESA was performed in conformance with the scope and limitations of ASTM Standard Practice 1527-13. The purpose of the investigation was to identify the presence of any recognized environmental conditions (RECs), including controlled recognized environmental conditions (CRECs) and historical recognized environmental conditions (HRECs), in connection with the Project Site. RECs are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release.

According to ASTM E2600-15, the goal of conducting a vapor encroachment screening on a parcel of property is to identify a vapor encroachment condition (VEC), which is the presence or likely presence of chemicals of concern vapors in the subsurface of the target property (TP) caused by the release of vapors from contaminated soil or groundwater or both either on or near the target property as identified by Tier 1 or Tier 2 procedures. The purpose of Tier 1 is to conduct

a screen using Phase I ESA-type information to determine if a VEC exists at the target property. If the Tier 1 screen cannot rule out the possibility of a VEC existing at the target property, then a Tier 2 screen can be conducted. Tier 2 applies numeric screening criteria to existing or newly collected soil, soil gas, and/or groundwater testing results to evaluate whether or not a VEC can be ruled out. Tier 2 has two data collective components: non-invasive and invasive.

As discussed in the Phase I ESA, a review of historical sources showed that the Project Site was undeveloped as early as 1894 until at least 1928 with the use of the Project Site as orchards. The Project Site appeared undeveloped by 1952 and remained relatively unchanged until the construction of a nursing home in 1972. The nursing home was demolished by April 2021.

Construction

Hazardous Waste Generation, Handling, and Disposal

As discussed above, construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban development project. All of these materials would be used temporarily during construction. Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Construction activities would be contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. As such, Project construction activities would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials.

Risk of Upset from Recognized Environmental Conditions and Other Site Conditions

At the time of the Project Site reconnaissance, the Project Site was unoccupied. Chain link fencing was observed along the perimeters of the Project Site and no stationary equipment was observed.

The Phase I ESA did not identify any HRECs or CRECs in connection with the Project Site. However, several properties within close proximity to the Project Site were found to have some potential degree of environmental risk.

- **6734 Sepulveda Boulevard:** Located approximately 33 feet north of the Project Site, this property was occupied as a gasoline service station in 1940. This listing is associated with the adjoining property north of the Project Site. Upon review of historic building permits it was determined that a service station was constructed at the property in 1927 and was occupied as a used car lot by 1950. The service station was converted to a vegetable stand by 1952. The structures at the property were demolished by 1964 and the current retail shopping center was constructed in 1965. This property was also identified on the Los Angeles Fire Department's (LAFD's) Underground Storage Tank (UST) and

hazardous materials inventory listings with an inactive status. Since the property was not identified on the historical UST databases, the LAFD listing is likely associated with USTs removal. While the USTs have likely been removed, it is unclear when the USTs were removed.

Based on the proximity to the Project Site and the lack of information regarding the USTs, the historic occupancy as a gasoline station represents a VEC concern. Based on the subsurface investigations conducted at the Project Site, the source of the detected benzene in soil vapor is possibly from the former adjoining gasoline station and represents a REC.

- **6759 Sepulveda Boulevard:** Located approximately 225 feet northwest of the Project Site, this property was occupied as a gasoline service station from 1969 to 1977 and as an automotive repair shop in 1991. According to reviewed building permits and aerial photographs, this property appeared to be developed with a service station by 1947. A new service station was constructed in 1960. A grading permit to backfill tank hole was issued in 1989. Due to the removed UST and distance from the Project Site, this listing is not likely to have adversely affected the Project Site.

- **6810 Sepulveda Boulevard:** Located approximately 515 feet north-northwest of the Project Site, this property was occupied as a gasoline service station from 1969 to 1991; a carwash from 1988 to 2011; and a general automotive repair shop in 2010. This property was also identified as a Leaking Underground Storage Tank (LUST) site. Based on the case closure and distance from the Project Site, this property is not likely to have adversely affected the Project Site.

- **6754 Sepulveda Boulevard:** Located approximately 174 feet northwest of the Project Site, this property was occupied by a garment pressing and cleaners' agents from 1973 to 1980; and a dry cleaning plant from 1982 to 2014. The facility is currently operating as a coin-operated laundry with dry cleaning services. The rear of the tenant space is located approximately 20 feet north of the Site boundary. The SCAQMD Facility Index System (FINDS) for information regarding the dry cleaning equipment was review. The facility has operated dry cleaning equipment with PCE from 1985 until at least 2014. No dry cleaning equipment is currently listed, which means the current dry cleaning service is likely off-site.

  The historic use of PCE and its proximity to the Project Site represents a VEC concern. Based on the subsurface investigations conducted at the Project Site, the source of the detected PCE in soil vapor is likely from the former adjoining dry cleaner and represents a REC.

As outlined in the Phase I ESA, the Site was identified on the FINDS, Enforcement and Compliance History Information (ECHO), Hazardous Waste Tracking System (HWTS) and Resource Conservation and Recovery Act (RCRA) Non-Generator/No Longer Regulated (NONGEN/NLR) databases. FINDS contains facility information and "pointers" to other sources

that contain more detail; ECHO provides integrated compliance and enforcement information; HWTS is the Department of Toxic Substances Control's (DTSC) data repository for hazardous waste identification and manifest information; and RCRA NONGEN/NLR is the Environmental Protection Agency's (EPA) comprehensive information system that includes selective information on RCRA facilities that do not generate hazardous waste. The Project Site was identified on these databases due to being identified as a generator of asbestos-containing materials in December 2020 and January 2021. No violations were reported. The appearance of the Project Site on these databases reflects proper disposal of hazardous waste and does not represent an environmental concern.

As outlined in the Phase I ESA prepared for the Project, based on the previous subsurface investigations, the Project Site has been impacted by PCE and benzene in the soil vapor, reported in 2020 and 2021 to be above residential screening levels.

The Project would adhere to all applicable regulations regarding soils, including SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) and applicable NPDES permit requirements. SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of a UST or piping which has stored VOCs; the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil (i.e., soil which registers 50 ppm or greater using an organic vapor analyzer calibrated with hexane) at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be maintained on-site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. If VOC-contaminated soil is detected, the approved mitigation plan would be implemented. As such, compliance with existing regulations would ensure the Project would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of VOC-contaminated soil that may be encountered on-site.

Furthermore, the Phase I ESA recommends the preparation of a Human Health Risk Assessment (HHRA) to determine whether the VOCs detected in soil vapor represents a threat to current and future human health, and to determine whether risk-control measures would be required to protect future tenants and workers based on any planned residential development. The installation of a soil vapor barrier and passive venting system would be recommended based on the results of the HHRA. The preparation and implementation of a Safety Management Plan (SMP) prior to any construction activities that require excavation of soil is also recommended. In addition to compliance with regulatory requirements, these site-specific recommendations are outlined in Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would address specific site conditions, would be implemented to ensure that the Project would not exacerbate the risk of upset and accident conditions associated with RECs and other site conditions.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, there is no evidence of existing aboveground storage tanks (ASTs) or USTs, clarifiers, sumps, or grease interceptors were observed on the Project Site. In addition, no other records were found that indicate the presence of any USTs within the areas proposed for construction. In the unlikely event that USTs are found during construction of the Project, they would be removed in accordance with applicable federal, State, and local regulations. Thus, the Project would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Asbestos-Containing Materials

The EPA issued a final rule under Section 6 of Toxic Substances Control Act (TSCA) banning most asbestos-containing building materials (ACBMs) in 1989. The ban on ACBMs was vacated in 1991 allowing some building materials to continue to contain asbestos. The applicability of the EPA's National Emission Standards for Hazardous Air Pollutants[64] apply to the owner or operator of a facility where an inspection for the presence of asbestos-containing materials (ACM). Building materials, coatings and/or finishes containing asbestos materials may be present in any structure regardless of the date of construction. In accordance with NESHAP and the local air pollution control district regulations, all suspect materials, finishes, and coatings that would be impacted by renovation or demolition regardless of the date of construction are required to be surveyed for the presence of asbestos by State-licensed asbestos consultants.

No structures were observed on the Project Site. Therefore, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

Lead-Based/Lead-Containing Paints

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has greater than or equal to one milligram per square centimeter (mg/cm2) (5,000 microgram per gram (µg/g) or 5,000 parts per million (ppm)) of lead by federal guidelines. In 2009, the US Consumer Product Safety Commission[65] banned paint containing more than 0.009 percent (90 ppm) lead for residential use. Buildings built before 1978 are much more likely to have LBP; however, all commercial structures regardless of the date of construction likely contain lead-based or lead-containing glazings, varnishes, stains, coatings, paints, and primers. Such materials that would be impacted by renovation, repair, or demolition should be tested beforehand and the results disclosed to trades or staff that would be doing such work. All associated waste streams should be accurately characterized for proper disposal requirements.

As discussed above, the Project Site was identified on the FINDS, ECHO, HWTS and RCRA NONGEN/NLR database, which are associated with the Project Site being identified as a

[64] NESHAP, 40 CFR Chapter 61, Subpart M.

[65] 16 Code of Federal Regulations CFR 1303.

generator of asbestos-containing materials in December 2020 and January 2021. However, no violations were reported and no existing structures were observed on the Project Site. Therefore, with compliance with relevant regulations and requirements, the Project would not expose people to a substantial risk resulting from the release of LPB into the environment.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) were an ingredient added to a variety of building materials during manufacture, most notably, but not limited to, caulking, putty, and glazing, particularly around windows, door frames, and building joints. Building materials containing PCBs were used in many buildings in the 1950s through the 1970s, and potentially before the 1950s. There are significant regulations regarding the removal of these materials during demolition and/or renovation, both from an environmental protection standpoint as well as an occupational health and safety standpoint.

Based on the construction date for the previous Project Site building, building materials containing PCBs may have been used in the construction of the building. However, the Project Site is currently vacant. Therefore, the Project would not exacerbate reasonably foreseeable upset and accident conditions associated with PCBs.

Oil Wells and Methane

Radon

The California Bureau of Mines and Geology and California Department of Public Health (CADPH) participated in the United States EPA's State Radon Survey, a Federal survey to measure levels of indoor radon in all States. The CADPH predicted that approximately 0.5 percent of homes in Region 9 would have radon concentrations over the EPA action level of 4.0 picoCuries per liter (pCi/L).

The Federal EPA Radon Zone for Los Angeles County is Zone 2, which indicates an average indoor concentration greater than or equal to 2.0 pCi/L of air and less than or equal to 4.0 pCi/L. In a survey, 39 tests were performed within the 91405 zip code for the presence of radon. Of these, none were found to contain radon in excess of 4.0 pCi/L.

Methane

In March 2004, Ordinance Number 175790 was adopted into the LAMC[66] to establish citywide methane mitigation requirements, and included updated construction standards to control methane intrusion into buildings. This ordinance established defined geographic areas as Methane Zones and Methane Buffer Zones, which relate to specific assessment and mitigation requirements per area, and set forth a standard of assessment and mitigation in the planning stages of all new construction in these areas.

[66] Section 91.106.4.1 and Division 71, Chapter IX.

The Project Site is not located within the City of Los Angeles Methane or Methane Buffer Zones recognized by the Los Angeles Department of Building and Safety.

Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a residential building. This typical urban use does not involve the routine use of hazardous materials**.** Instead, the operation of the Project has limited hazardous materials that are similar to any other urban development such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with residential land uses. As a result, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Therefore, operation of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Risk of Upset from Recognized Environmental Conditions and Other Site Conditions

As discussed above, the Project Site was identified on the FINDS, ECHO, HWTS and RCRA NONGEN/NLR database, which are associated with the Project Site being identified as a generator of asbestos-containing materials in December 2020 and January 2021. No violations were reported. The Project would adhere to applicable regulatory requirements pertaining to the use of hazardous materials, including the maintenance of required inspection logs, manifests, and records. Thus, operation of the Project would not exacerbate the risk of upset and accident conditions.

Underground and Aboveground Storage Tanks

According to the Phase I ESA and as discussed above, there is no evidence of existing USTs or ASTs on the Project Site. The Project does not propose the installation of other USTs or ASTs as part of its operation. Thus, Project operation would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to friable asbestos or ACMs at the Project Site.

Lead-Based/Lead-Containing Paints

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to LBP at the Project Site.

Polychlorinated Biphenyls

In accordance with existing regulations that ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs, and operation of the Project would not expose people to any risk resulting from the release of PCBs into the environment.

Oil Wells and Methane

The Project does not include the installation of new oil wells. As such, operation of the Project would not exacerbate the risk of upset and accident conditions associated with operation or re-abandonment of oil wells. In addition, the Project is not located within a City of Los Angeles Methane or Methane Buffer Zones recognized by the Los Angeles Department of Building and Safety.

Thus, operation of the Project would not exacerbate environmental hazards relative to oil wells or methane.

In summary, potential impacts associated with the release of hazardous materials may occur based on the Phase I ESA and previous subsurface investigations which find that the Project Site has been impacted by PCE and benzene in the soil vapor above residential screening levels.

Mitigation Measures

The following mitigation measures are provided to reduce Project impacts related to the release of hazardous materials into the environment:

HAZ-MM-1: As recommended in the Phase I ESA, prior to construction of the Project, a Human Health Risk Assessment shall be prepared to determine whether the VOCs previously detected in soil vapor on the Project Site represent a threat to current and future human health, and to determine whether risk-control measures would be required to protect future tenants and workers based on the planned residential development. Any requirements such as the installation of a soil vapor barrier and passive venting system recommended based on the results of the HHRA, shall be implemented prior to Project construction.

HAZ-MM-2: As recommended in the Phase I ESA, prior to construction of the Project, a Soil Management Plan shall be prepared and implemented prior to any construction

activities that require excavation of soil. At a minimum the Soil Management Plan must specify site-specific requirements, including a health and safety plan.

Based on the above, with adherence to regulatory requirements and project design features, and implementation of Mitigation Measures HAZ-MM-1 and HAZ-MM-2, construction and operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with hazardous waste generation, handling, and disposal during construction and operation of the Project would be less than significant with mitigation.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

There is one existing school site within a quarter-mile of the Project Site (Columbus Avenue Elementary School, 6700 Columbus Avenue) located directly across the street to the east of the Project Site. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of mixed-use projects incorporating live/work and commercial uses (e.g., cleaning solutions, solvents, painting supplies, batteries, etc.). However, it is reasonably anticipated that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, State, and local regulations. As such, the use of such materials would not create a significant hazard to any nearby schools. Additionally, as discussed above in Section VIII(a), the Project is not expected to result in hazardous emissions. ***Therefore, impacts would be less than significant***.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

As discussed above, the Project Site was identified on the FINDS, ECHO, HWTS and RCRA NONGEN/NLR database, which are associated with the Project Site being identified as a generator of asbestos-containing materials in December 2020 and January 2021. No violations were reported. The appearance of the Project Site on these databases reflects proper disposal of

hazardous waste and does not represent an environmental concern. ***Thus, based on the above analyses, while the Project is identified on standard government sources that monitor hazardous materials, conditions on the Project Site would not create a significant hazard to the public or the environment, and impacts would be less than significant***.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The Project Site is located approximately 2.3 miles northwest of the Van Nuys Airport (16461 Sherman Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Van Nuys Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Van Nuys Airport).[67] ***Accordingly, no impacts associated with safety hazards or excessive noise from proximate airports would occur***.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

Sepulveda Boulevard is not identified as a selected disaster route by the City,[68] nor as a disaster route by Los Angeles County.[69] Construction of the Project would not require road closures and emergency access to the Project Site would be maintained in accordance with the LAMC and the LAFD requirements. In addition, construction of the Project would not substantially impede public access or travel on public rights- of-way such as Sepulveda Boulevard or Columbus Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

Additionally, operation of the Project would not permanently alter vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. Furthermore, as discussed below under see Section XVII, Transportation, the Project would not result in any significant traffic impacts. The Project Site is not located within a Hillside Area[70] and the Project would comply with

[67] Los Angeles County, Airport Land Use Commission, Santa Monica Airport, Airport Influence Area Map, May 13, 2003.

[68] City of Los Angeles Geo Hub, Disaster Routes, https://geohub.lacity.org/datasets/6223f108d67d49958d05092e0b488740/explore?location=34.191708%2C-118.463925%2C15.00. Accessed October 2022.

[69] Los Angeles County Department of Public Works, Disaster Routes with Roads Districts Map, City of Los Angeles Valley Area, August 13, 2008.

[70] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

evacuation requirements according to the LAMC and the LAFD. An emergency response plan would be submitted to the LAFD during review of plans as part of the City's standard building permit process. ***Therefore, there would be no impacts to emergency response or evacuation plans.***

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire.

The Project Site is not located in a Very High Fire Hazard Severity Zone;[71] nor is the Project Site within a wildland fire hazard area.[72] In addition, the Project Site is located in a highly urbanized area of the City, and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. ***Accordingly, no impacts related to the exposure of people or structures to loss, injury, or death involving wildland fires would occur***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the hazards and hazardous materials analysis above, including the transport of hazardous materials, upset and accident conditions, handling of hazardous materials, etc. The cumulative impacts hazardous materials study area is the extent of the Related Projects.

Development of the Project in combination with the Related Projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the Related Projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant and, therefore, would not substantially contribute to a cumulative impact. Furthermore, local municipalities would be required to follow local, State, and federal laws regarding hazardous materials. ***With compliance with local, State and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant***.

[71] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

[72] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial

adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.

b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.

c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.

d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.

e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.

f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:

g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.

h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.

i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.

j) Comply with applicable municipal separate storm sewer system

discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.

k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.

l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.

m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

Applicability to the Project

Consistent with PMM HYD-1, and as described below, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building plan review and approval process for the Project. Compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure PMM HYD-1, would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, PMM HYD-1 is not applicable to the Project.

PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Avoid designs that require continual dewatering where feasible.

For projects requiring continual dewatering facilities, implement monitoring

systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.

b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.

c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

Applicability to the Project

Since the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. Thus, PMM HYD-2 is not applicable to the Project.

PMM HYD-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Applicability to the Project

As discussed below, the Project Site is not located in a flood zone and would not impede or redirect flood flows. Therefore, PMM HYD-3 is not applicable to the Project.

Impact Analysis

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Surface Water Quality

Construction

Construction activities associated with the Project have the potential to degrade surface water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. However, construction activities would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, National Pollutant Discharge Elimination System (NPDES) No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed federal, State, and local mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation, disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

Operation

With respect to runoff water quality during operation of the Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of this Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, and would thus apply to the Project. This Program requires, among other things, that projects

retain on site the runoff volume from: (a) the .75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drainage system. The system incorporated into the Project must follow specific design requirements set forth in the MS4 permit and must be approved by the City as part of the standard building permit process.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance effective May 12, 2012, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the site. The SUSMP consists of structural BMPs built into the design of a project for ongoing water quality purposes over the life of a project.

Groundwater Quality

Construction

Groundwater was not encountered during subsurface exploration conducted as part of the Geotechnical Report to the maximum depth explored (80½ feet below the ground surface) and historically high groundwater depth in the vicinity is approximately 40 feet below the ground surface.[73] Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 30 feet below ground surface, including foundation excavations. Considering the lack of groundwater in the subsurface borings at the Project Site, and the depth of the proposed construction, it is unlikely that static groundwater would be encountered during construction. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements

[73] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation would be critical for future performance of the Project. As previously discussed in Section VII. Geology and Soils, the Project would be required to incorporate the recommendations of the Geotechnical Report and regulatorily required to comply with all conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for underlying soil conditions.

Operation

Operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground storage tanks are currently operated at the Project Site nor would any be operated by the Project. While the development of new six-story building would increase the use of on-site hazardous materials, such as cleaning, maintenance, and landscaping supplies, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Conclusion

Overall, as analyzed above, the construction or operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

Construction

There is one groundwater production well or supply wells within one mile of the Project Site.[74] The well is located 0.6 mile east of the Project Site. However, construction activities would not be anticipated to affect existing wells, nor would the Project include the construction of water supply wells. Groundwater was not encountered during subsurface exploration conducted as part of the Geotechnical Report to the maximum depth explored (80½ feet below the ground surface) and historically high groundwater depth in the vicinity is approximately 40 feet below the ground

[74] Los Angeles County Department of Public Works, Groundwater Wells, https://dpw.lacounty.gov/general/wells/#. Accessed October 2022.

surface.[75] Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 30 feet below ground surface, including foundation excavations. Considering the lack of groundwater in the subsurface borings at the Project Site, and the depth of the proposed construction, it is unlikely that static groundwater would be encountered during construction. However, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation would be critical for future performance of the Project. As previously discussed in Section VII. Geology and Soils, the Project would be required to incorporate the recommendations of the Geotechnical Report and regulatorily required to comply with all conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for underlying soil conditions. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Basin.

Operation

Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources outside the Los Angeles Basin. Furthermore, the Project's BMPs, as described above, would capture stormwater from the developed portions of the Project Site to be used for landscaping irrigation. Thus, the majority of the stormwater runoff would be retained on-site. The stormwater that bypasses the capture and use system would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, since the Project Site was recently developed and provides little groundwater recharge potential, operation of the Project would not substantially impact the amount of groundwater recharge occurring on-site. As such, through adherence with regulatory compliance measures, operation of the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Conclusion

Construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin, and impacts during construction and operation of the Project would be less than significant.

[75] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

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

i. Result in substantial erosion or siltation on- or off-site;

Less than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

Construction

The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include excavating down approximately 30 feet for subterranean parking, building up of the structure, and constructing hardscape and landscape around the building. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils and modifying flow direction. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. However, construction associated with the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board's (LARWQCB) Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (Los Angeles County MS4 Permit); which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[76] ESCPs are required to include the elements of a SWPPP. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

Operation

During the Project's operational phase, most of the Project Site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. During operation of the Project, stormwater discharge would continue to be directly to Sepulveda Boulevard and Columbus Avenue. As part

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

of the Project, the entire Project Site would be developed with a residential high-rise, landscaping, and pavement. The proposed structure, pavement, and landscaping would prevent substantial erosion.

Conclusion

The Project would comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management. Through compliance with these regulatory requirements, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site. Thus, impacts would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties.

As discussed under Section X(ci), during construction of the Project, a temporary alteration of the existing on-site drainage pattern may occur from land cover and site preparation and grading for construction. However, these changes would not result in a substantial increase in the rate or amount of surface runoff that could result in flooding due to stringent controls imposed under the NPDES MS4 Permit, including preparation of an ESCP and BMPs for the control of runoff.

Additionally, as also discussed under Section X(ci), the Project would not significantly alter the drainage pattern of the Site. Furthermore, the Project is unlikely to alter the drainage pattern in a manner that would result in substantial flooding during operation because the Project would be required to comply with the requirements of the SUSMP, MS4 permit, and LID Ordinance, which result in and require a reduction of the volume of runoff from the Project Site after the Project is constructed. Additionally, the Project would comply with LID requirements by storing the required design storm in underground cisterns for later use as on-site irrigation. This system would reduce the stormwater discharges from the site and result in a lower impact to the city storm drain system. Adherence to these regulations and permits would prevent an increase in stormwater flows, and because the Project would not alter offsite water conveyance facilities, no offsite flooding would occur.

With compliance with the NPDES MS4 Permit, including implementation of BMPs, and compliance with applicable regulatory requirements including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management, the Project would not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Thus, impacts would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site. A project-related significant adverse effect may also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction

As previously discussed, the Project would not increase the amount of surface runoff from the Project Site during construction. The Project would prepare an ESCP and include BMPs for the control of runoff and water quality impacts during construction in accordance with the MS4 Permit. Therefore, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems during construction. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration, and would not result in any significant environmental impacts given the disturbed nature of the right-of-way. Furthermore, as the Project would manage, capture, and treat runoff during construction, as required by regulatory compliance, implementation of the Project would represent an improvement in water quality as compared to the existing condition where runoff sheet flows untreated to the drainage system.

Operation

As previously discussed, the Project would comply with LID requirements by storing the required design storm in underground cisterns for later use as on-site irrigation. This system would reduce the stormwater discharges from the site and result in a lower impact to the city storm drain system compared to the site's previous development. As such the city storm drain has sufficient capacity for the proposed development.[77] Furthermore, the Project BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site. With regard to polluted runoff, the LID requirements for the Project Site would outline the stormwater treatment post-construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program.

Conclusion

Therefore, based on the above, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would create or contribute runoff water

[77] Utility Report for 6728 Sepulveda Apartments, prepared by Labib Funk + Associates, August 29, 2022. Refer to Appendix L of this SCEA.

that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff during construction or operation. Impacts would be less than significant.

iv. Impede or redirect flood flows?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of flood flows.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard and having a less than 0.2 percent annual chance for a flood.[78] No streams or rivers that may overflow or breech a levee are located on or near the Project Site and the Project Site is not located within any high-risk coastal areas.

As previously discussed, the City of Los Angeles General Plan Safety Element indicates that the Project Site is located within a potential inundation area for dam failure from the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir.[79] However, the Project does not propose any structures which would impede floodwater such as a dam or berm, and, as detailed above, no substantial alterations to the existing drainage pattern of the Project Site or area would occur during construction or operation. Accordingly, the Project would not be expected to impede or redirect flood flows from the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir. Additionally, these dams, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing reservoirs and dams are intended to ensure that all are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the reservoir and/or dam. Pursuant to these regulations, the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir, are regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. ***Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant***.

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[78] Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1305F, effective September 2008.

[79] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

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

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

Flood Hazard

As discussed in Section X(civ), the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[80] Zone X is characterized as an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level. In addition to the low risk of flooding, the Project would implement capture and use BMPs to retain stormwater runoff on-site, as described above. Thus, impacts would be less than significant.

Dam Failure

As previously discussed, the City of Los Angeles General Plan Safety Element indicates that the Project Site is located within a potential inundation area for dam failure from the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir.[81] Inundation of the Project Site resulting from dam failure could release pollutants into surface water should flood waters encounter contaminants at the Project Site. As previously discussed, the Project does not propose any structures which would impede floodwater such as a dam or berm, and, as detailed above, no substantial alterations to the existing drainage pattern of the Project Site or area would occur during construction or operation. Accordingly, the Project would not be expected to impede or redirect flood flows from the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir. Additionally, these dams, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing reservoirs and dams are intended to ensure that all are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the reservoir and/or dam. Pursuant to these regulations, the Los Angeles Reservoir, Lopez Dam, and Pacoima Reservoir, are regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. As such, impacts would be less than significant.

[80] Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1305F, effective September 2008.

[81] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February 25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

Seiche, Tsunami, Mudflow

The Project Site is over 17 miles from the Pacific Ocean and is located not within an area potentially impacted by a tsunami.[82] There are also no major water bodies in the vicinity of the Project Site that would put the Project Site at risk of inundation by seiche. As such, the Project would not be vulnerable to seiche, tsunami, or mudflow and impacts would be less than significant.

Conclusion

The Project would not risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans**.**

Water quality control plans applicable to the Project include the LARWQCB Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) and the City's Water Quality Compliance Master Plan for Urban Runoff (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, 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 Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL).

Implementation Plans and Watershed Management Plans

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, in Section X(a), above, groundwater was not encountered during subsurface exploration conducted as part of the Geotechnical Report to the maximum depth explored (80½ feet below the ground surface).[83]

[82] California Department of Conservation, Los Angeles County Tsunami Inundation Maps, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/. Accessed October 2022.

[83] Geotechnical Investigation—Proposed Multi Family Residential Development, 6728 N. Sepulveda Boulevard & 6715 N. Columbus Avenue, Los Angeles, California prepared for the Project by Geocon West, Inc., dated February

Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 30 feet below ground surface, including foundation excavations. Considering the lack of groundwater in the subsurface borings at the Project Site, and the depth of the proposed construction, it is unlikely that static groundwater would be encountered during construction. Furthermore, construction of the Project would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the MS4 Permit, including implementation of an ESCP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the proposed residential land uses do not represent the type of uses that would have the ability to adversely affect water quality. Anticipated and potential pollutants generated by operation of the Project would be addressed through the implementation of approved LID BMPs. While the development of new building facilities would increase the use of on-site hazardous materials (i.e., those typically used on residentially zoned properties such as cleaning, maintenance, and landscaping supplies), compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local, and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically over drafted basins until 2020) to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically over drafted basins) to achieve groundwater sustainability.

The Project Site overlies the Coastal Plain of San Fernando Valley Groundwater Basin.[84] The Project would receive its water from the LADWP. Both the LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Further, protection from potential

25, 2022. Refer to Appendix G.1 of this SCEA. Soils Report Approval Letter, City of Los Angeles Department of Building and Safety, October 24, 2022. Refer to Appendix G.2 of this SCEA.

[84] Phase I, Environmental Site Assessment Report for 6728 Sepulveda Boulevard prepared by Citadel EHS, dated May 20, 2022 (Refer to Appendix I.1 of this SCEA).

overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando Basin. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years.

As described in detail in Section XIX(b), the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code**.** Additionally, the Project would not have the potential to impact the amount of groundwater recharge as the Project Site is almost entirely impervious and does not currently provide recharge for the groundwater basin.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Conclusion

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Accordingly, impacts would be less than significant**.**

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the hydrology and water quality analysis above. The cumulative impacts hydrology and water quality study area is the extent of the Related Projects as well as the Los Angeles River Watershed.

With respect to construction impacts, it is unknown whether or not any of the Related Projects would have overlapping construction schedules with the Project. However, similar to the Project, the Related Projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with the Related Projects would result in the further infilling in an already developed area. As discussed above, the Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system and otherwise retain stormwater on-site.

The runoff associated with the Related Projects would either be directed to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. The Related Projects would include a drainage system with pipes that would adequately convey surface water

runoff into the existing storm drain. In addition, all of the Related Projects would be required to implement BMPs and to conform to the existing NPDES water quality program. ***Therefore, cumulative hydrology, water quality, and flooding impacts during operation would be less than significant***.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Facilitate good design for land use projects that build upon and improve existing circulation patterns

b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:

- Selecting alignments within or adjacent to existing public rights of way.
- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
- Wherever feasible incorporate direct crossings, overcrossings, or

under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).

c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:

– Alignment shifts to minimize the area affected.

– Reduction of the proposed right-of-way take to minimize the overall area of impact.

– Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

Applicability to the Project

As described under Land Use Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 is not applicable to the Project.

PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.

Applicability to the Project

As outlined in the impact analysis under Land Use Threshold (b) below, the Project would not physically divide an established community or create a significant environmental impact due to a conflict with the 2020–2045 RTP/SCS, LAMC, Van Nuys-North Sherman Oaks Community Plan, or the City of Los Angeles General Plan. Therefore, Mitigation Measure LU-2 is not applicable to the Project.

Impact Analysis

a. Physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is located at 6728 N. Sepulveda Boulevard and 6715 N. Columbus Avenue, and is bounded by Sepulveda Boulevard to the west, by commercial uses to the north, by Columbus Avenue to the east, and by a convalescent center to the south.

The 94,951 square-foot Project Site is currently vacant, encompassed by a wrought iron fence on the western half and a paved parking area on the eastern half. The Project Site is bounded by an alley way to the north, N. Sepulveda Boulevard to the west, N. Columbus Avenue to the east, and a single-story structure to the south. The Project Site is surrounded by other development. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. The Project would provide a multi-family residential use that would be consistent with the pattern of land uses in the surrounding area. The Project would not constitute a physical barrier separating an established community. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly. ***Therefore, the Project would not physically divide an established community and no impact would occur***.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

Applicable Land Use Policies and Regulations

At the regional level, development within the Project Site is subject to the following:

- SCAG's *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*

At the City level, development within the Project Site is subject to the following:

- *City of Los Angeles General Plan*;
- *Mobility Element 2035;*
- *Van Nuys-North Sherman Oaks Community Plan*;

- City of Los Angeles Planning and Zoning Code (*City of Los Angeles Municipal Code* Chapter 1, General Provisions and Zoning); and

- *Citywide Design Guidelines.*

An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

Consistency with Regional Plans

Southern California Association of Governments/Regional Transportation Plan

On September 3, 2020, the SCAG Regional Council adopted the 2020-2045 RTP/SCS, also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2019-2040 RTP/SCS, increase the share of new regional household growth occurring in HQTA's by six percent and the share of new job growth in HQTAs by 15 percent.

The Project's consistency with the 2020-2045 RTP/SCS is summarized in Chapter 4 (See Table 4.1). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTA and TPA, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle

parking spaces for the proposed uses that would serve to promote use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with the applicable objectives of the 2020-2045 RTP/SCS.

Consistency with Local Plans

City of Los Angeles General Plan

The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Single-Family Residential, Multifamily Residential, Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, General Commercial Areas, Mixed-Use Boulevards, Industrial Districts, Transit Stations, Pedestrian-Oriented Districts, and Historic Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City. The Project Site is identified as being located within a General Commercial Area.

Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. The Urban Form and Neighborhood Design Chapter of the Framework Element encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City's residents; and guide amendments to the General Plan Open Space Element and Conservation Element.

Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies include retaining commercial uses, particularly within walking distance of residential areas, promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods, and retaining industrial land uses on appropriate sites.

Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016. Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035.

Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban

forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 5.10, *Applicable Objectives and Policies of the General Plan Framework Element,* along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed below for informational purposes. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

Table 5.10, lists the goals, objectives, and policies that apply to developers in collaboration with local government. As shown, the Project would be consistent with the applicable policies.

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
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.	**No conflict.** The Project would develop 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in the Van Nuys-North Sherman Oaks Community Plan area, which would help meet the anticipated growth in housing demand for the area and the City.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long- Range Land Use Diagram.	**No conflict.** As discussed below in Section XIII. Public Services and Section XVII. Utilities and Service Systems, in this SCEA, the agencies that provide public infrastructure, services, and utilities to the Project Site would have capacity to serve the Project.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**No conflict.** The Project would promote an improved quality of life by constructing infill development near several public transit options, including Metro bus lines 165 and 234, and the Sepulveda Metro G Line (Orange) Station, is located one (1) mile north, which would reduce vehicle trips, vehicle miles traveled, and air

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	pollution. In addition, the Project encourages active transportation by including 176 long-term bicycle parking spaces and 18 short-term bicycle parking spaces.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No conflict.** The Project location in an area well-served by transit, residential uses, and commercial uses and would encourage bicycle access to these uses. The Project would provide secure bicycle parking to promote cycling.
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.	**No conflict.** The Project would develop 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in an urbanized area well-served by transit, and within walking distance of commercial uses. The residential use would support the Project area's existing range of services and activities.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**No conflict.** The Project locates new multi-family housing in proximity to transit as evidenced by the Project Site's eligibility for TOC Guidelines Tier 3 incentives and designation as a Transit Priority Area.
Housing Chapter	
Policy 2.1.4: Enhance livability of neighborhoods by upgrading the quality of development and improving the quality of the public realm, including streets, streetscape and landscaping to provide shade and scale.	**No conflict.** The Project would include design elements that reinforce orientation to the street, such as a glass façade with a well-defined, easily recognizable main entrance, that is fully landscaped.
Objective 2.3: Encourage the location of housing, jobs, and services in mutual proximity. Accommodate a diversity of uses that support the needs of the City's existing and future residents.	**No conflict.** The Project would promote an improved quality of life by constructing infill development near several public transit options, including Metro bus lines 165 and 234, and the Sepulveda Metro G Line (Orange) Station, is located one (1) mile to the north, as well as within numerous retail, dining, and employment opportunities.
Policy 2.3.1: Encourage and plan for high-intensity residential and commercial development in centers, districts, and along transit corridors, as designated in the Community Plans and the Transportation Element of the General Plan, and provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled in order to mitigate traffic congestion, air pollution, and urban sprawl.	**No conflict.** The Project would promote an improved quality of life by constructing infill development near several public transit options, including Metro bus lines 165 and 234, and the Sepulveda Metro G Line (Orange) Station as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for residents to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists.

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Policy 2.3.3: Encourage the development of new projects that are accessible to public transportation and services consistent with the community plans.	**No conflict.** The multi-family residential Project would include up to 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households. Several public transit options, including Metro bus lines 165 and 234, and the Sepulveda Metro G Line (Orange) Station, are located within the Project area.
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	**No conflict.** The Project would develop 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in the Van Nuys-North Sherman Oaks Community Plan area, which would help meet the anticipated growth in housing demand for the area and the City.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**No conflict.** The multi-family residential Project would include up to 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households. The Project would be permitted to develop a 6-story tall building at the Project Site through the residential density increases allowed through the TOC Affordable Housing Incentive Program as a Tier 3 project and pursuant to its provision of affordable housing for Extremely Low-Income Households. The Project would be similar to other mid-rise structures along Sepulveda Boulevard, which is a major arterial roadway well-served by transit. Furthermore, the Project's height, scale and massing has been designed to be compatible with surrounding existing development and consistent with the City's goals to place new high-density housing near transit options. The Project is thoughtfully designed given the adjacency of the elementary school and smaller scale commercial uses with a large break in massing on the southern façade and expansive open space areas. The building is carefully arranged to capture the strong, linear form of the site with a simple white and salmon pink stucco finish.
Objective 4.3: Conserve scale and character of residential neighborhoods.	**No conflict.** The Project Site vicinity includes a mix of low- and high-density neighborhoods, commercial uses, and a school. The Project Site is located along Sepulveda Boulevard, which is characterized by one- to five-story commercial and multi-family development. The nearest residential neighborhood to the Project Site is located east of Columbus Avenue, with additional residential uses located west directly across Sepulveda Boulevard. While the Project would result in an increase in the building density and maximum height on the Project Site, the height and bulk of the Project would remain consistent in scale with the surrounding uses. The Project would be designed to complement the

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	surrounding uses and respond to the low- to mid-scale character of the surrounding area. Specifically, the massing of the proposed building would include varied materials and colors to break up the building bulk and massing. The Project would maintain a consistent frontage with active ground-floor uses and a landscaped buffer area on the Sepulveda Boulevard frontage. In addition, the Project would include landscaped and terraced open space. As such, the Project would create an appealing and unified site that would respond to, and complement, the scale and character of the surrounding neighborhoods.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**No conflict.** The Project is located along Sepulveda Boulevard, which is well-served by existing transit service, including Metro bus lines 165 and 234. The Sepulveda Metro G Line (Orange) Station is located one (1) mile north. Sepulveda Boulevard is developed with a diversity of land uses, including commercial uses, that connects and serve the surrounding neighborhoods.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No conflict.** The Project would develop a vacant site with a residential development that would provide a total of 405 residential units, including up to 41 Extremely Low-Income affordable units (i.e., 10 percent of the total units). The Project would also incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies. The uses and amenities that would be provided by the Project would serve to enhance the livability of the neighborhood. In addition, the design elements that would be incorporated into the Project would further serve to enhance the livability of the neighborhood. The Project would be designed to complement the surrounding uses and respond to the low- to mid-scale character of the surrounding area. In addition, the proposed landscaping features would improve the quality of the public realm.
Policy 5.8.4: Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.	**No conflict:** Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. New signage would be architecturally integrated into the design of the buildings and would be designed to be aesthetically compatible with the architecture of the Project and the surrounding area. In addition, proposed

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	signage would comply with the requirements of the LAMC.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No conflict:** The Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. Additionally, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project's residents would be able to monitor suspicious activity at the building entry points.
Objective 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	**No conflict:** See consistency analysis for Objective 5.9.
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**No conflict.** The Project is located along Sepulveda Boulevard, which is well-served by existing transit service, including Metro bus lines 165 and 234. The Sepulveda Metro G Line (Orange) Station is located one (1) mile north. Sepulveda Boulevard is developed with a diversity of land uses, including commercial uses, that connects and serve the surrounding neighborhoods.
Infrastructure and Public Services Chapter	
Goal 9P: Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	**No conflict.** The Project would provide appropriate lighting for nighttime vision, visibility, and safety needs throughout the Project Site. This would include lighting provided along walkways and in outdoor gathering areas on the ground level and on the outdoor decks and low-level security, wayfinding, and landscape and architectural lighting throughout the Project Site. Sufficient lighting would also be provided in the subterranean parking levels to maximize visibility and reduce areas of concealment. Night lighting would be low profile and at the necessary intensity to provide a safe environment. Architectural and informational lighting would include low-level accent lighting on the proposed building to highlight architectural features and signage. All exterior lighting would be shielded or directed toward the areas to be illuminated to limit light

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	spillover onto off-site uses and would meet all applicable LAMC lighting standards, including those pertaining to projects within the RIO District. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to the approval of the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. As such, the Project would not conflict with this goal.
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No conflict.** The Project would be required to obtain coverage under the NPDES Construction General Permit and would implement a SWPPP that specifies BMP and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with NPDES Municipal Permit requirements, the Project would implement LID requirements throughout the operational life of the Project. Consistent with the City's LID requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the LID Manual.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No conflict.** The Project would implement Low LID requirements throughout the operational life of the Project to manage stormwater runoff and protect water quality.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No conflict.** As discussed in Section XIX (b), the Project would be within the LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not require or result in the construction of new water facilities or expansion of existing facilities.
Objective 9.40: Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	**No conflict.** Proposed lighting would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare. Thus, the Project would not conflict with this objective.
Objective 9.40.1: Require lighting on private streets, pedestrian oriented areas, and	**No conflict.** Refer to Goal 9P, above.

Table 5.10
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
pedestrian walks to meet minimum City standards for street and sidewalk lighting.	
Objective 9.40.2: Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	**No conflict.** Refer to the discussion for Goal 9P above. The Project would provide sufficient lighting throughout the Project Site to ensure safety and visibility. The proposed subterranean parking levels and pedestrian walkways would be well illuminated and designed to eliminate areas of concealment.
Objective 9.40.3: Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	**No conflict.** While this policy is a citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.
Source: City of Los Angeles, The Citywide General Plan Framework Element, adopted December 11, 1996, and August 8, 2001; EcoTierra Consulting, 2022.	

Mobility Element 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan 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." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of these goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is

included in Table 5.11, *Applicable Policies of the Mobility Plan 2035,* along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy.

Table 5.11
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
Chapter 1: Safety First	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	**No conflict.** The Project would prepare and implement a Construction Management Plan that would reduce construction-related impacts on the surrounding community, and would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways.
Chapter 2: World Class Infrastructure	
Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	**No conflict.** The Project would not modify existing bicycle facilities. The Project would enhance bicycle facilities on-site by providing short-term and long-term bicycle spaces in conformance with the City's Bicycle Ordinance.
Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.	**No conflict.** The proposed subterranean parking garage is a three level below grade structure with 556 parking spaces. Vehicular access to the Project Site would be provided via one driveway on Sepulveda Boulevard with additional access for emergency purposes only from Columbus Avenue. No dedicated passenger loading zones are currently provided or proposed. However, ample parking would be provided with anticipated turnover and availability to provide space for drop off and pickup service.
Chapter 3: Access for All Angelenos	
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral of the City's transportation system.	**No conflict.** Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility. The Project would promote the use of bicycles by providing access to short-term and long-term bicycle parking spaces on Site.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No conflict.** The Project would provide a residential use in an urbanized area well-served by transit, and within walking distance of commercial uses. The proposed residential use would support the Project area's existing range of services and activities.
Policy 3.4: Provide all residents, workers, visitors with affordable, efficient, convenient, and attractive transit services.	**No conflict.** The Project Site is located in an area well-served by public transit, including Metro bus lines and the Sepulveda Metro G Line (Orange) Station.
Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No conflict.** The Project would provide bicycle parking spaces on-site in accordance with LAMC requirements. The Project would provide 176 long-term bicycle parking spaces and 18 short-term spaces, for a total of

Table 5.11
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
	194 bike parking spaces. Bike parking spaces would be provided in the P1 level of the garage comprised of four bike rooms including a workspace. The 18 short-term bicycle parking spaces are proposed to be located along sidewalks and pedestrian walkways. Specifically, 11 short-term bicycle parking spaces would be located along the Project frontage on Sepulveda Boulevard and seven (7) short-term bicycle parking spaces would be located along the Project frontage on Columbus Avenue.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	**No conflict.** The Project supports reductions in VMT by providing a residential use within immediate walking distance of a several transit options, including Metro bus lines and the Sepulveda Metro G Line (Orange) Station, as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for residents to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists.
Source: City of Los Angeles, Mobility Plan 2035, September 7, 2017; EcoTierra Consulting, 2022.	

Van Nuys-North Sherman Oaks Community Plan

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

As set forth in the Community Plan, the Project Site is designated for General Commercial land uses.[85] Zoning designations consistent with the General Commercial land use category include C1.5, C2, C4, RAS3, and RAS4. Development of the Project would include the construction of a residential building. This type of development would be consistent with the General Commercial land use designation. Therefore, the Project would be consistent with the Community Plan land

[85] City of Los Angeles, General Plan Land Use Map, Van Nuys-North Sherman Oaks Community Plan as of February 2015.

use designation. Moreover, the Project is consistent with multiple other Community Plan objectives and policies. The Project's consistency with these applicable objectives and policies is presented in Table 5.12, *Consistency with the Van Nuys-North Sherman Oaks Community Plan.*

Table 5.12
Consistency with the Van Nuys-North Sherman Oaks Community Plan

Objectives and Policies[a]	Project Consistency
Residential	
Objective 1-1. Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Plan Area to the year 2010.	**No conflict.** The Project would develop 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in the Van Nuys-North Sherman Oaks Community Plan area.
Policy 1-1.2. Protect existing single family residential neighborhood from new, out of scale development.	**No conflict.** The Project vicinity is developed with a by a mix of low- and high-density neighborhoods, commercial uses, and a school. Sepulveda Boulevard in the Project vicinity is characterized by urban development including multi-family residential uses, strip malls, office uses, and medical buildings. The area transitions to lower density residential uses away from Sepulveda Boulevard and the other main arterials in the Project vicinity. The nearest single-family residential neighborhood to the Project Site is located east of Columbus Avenue, just beyond Columbus Avenue Elementary School. While the Project would result in an increase in the building density and maximum height on the Project Site, the Project has been thoughtfully designed given the adjacency of the elementary school and residential uses with a large break in massing on the southern façade and expansive open space areas, further breaking up the massing of the building from all perspectives. The overall building façade, with a simple white and salmon stucco finish, steps back from the street to visually lessen the scale of the Project from the street and sidewalk and includes extensive landscaping to further serve to maintain the scale and character of the area. These building and site design elements would improve the overall quality of the residential environment on the Project Site and in the surrounding area.
Policy 1-1.3. Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses.	**No conflict.** Refer to the discussion for Policy 1-1.2 above. The nearest single-family residential neighborhood to the Project Site is located east of Columbus Avenue, just beyond Columbus Avenue Elementary School. Additional residential neighborhoods are located further from the Project Site to the west. The Project would introduce higher density residential uses, which is permitted on the Project Site pursuant to the [Q]R4-1-RIO zone. Furthermore, as discussed above, the design of the Project would complement the existing surrounding

Table 5.12
Consistency with the Van Nuys-North Sherman Oaks Community Plan

Objectives and Policies[a]	Project Consistency
	uses and respond to the low- to mid-scale character of the surrounding area.
Policy 1-1.4. Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.	**No conflict.** Refer to the discussion for Policy 1-1.2 above.
Objective 1-2. To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	**No conflict.** The Project would promote an improved quality of life by constructing a new residential infill development near several public transit options, including Metro bus lines and the Sepulveda Metro G Line (Orange) Station, which would reduce vehicle trips, vehicle miles traveled, and air pollution.
Policy 1-2.1. Locate higher residential densities near commercial centers, light rail transit stations, and major bus routes where public service facilities and utilities will accommodate this development.	**No conflict.** The Project is located along Sepulveda Boulevard, which is well-served by existing transit service, including Metro bus lines and the Sepulveda Metro G Line (Orange) Station. Sepulveda Boulevard is developed with a diversity of land uses, including commercial uses, that connects and serve the surrounding neighborhoods.
Objective 1-3. To preserve and enhance the varied and distinct residential character and integrity of existing single and multi-family neighborhoods.	**No conflict.** Refer to the discussion for Policy 1-1.2 above.
Policy 1-3.1. Require a high degree of architectural compatibility with articulated landscaping for new in-fill development to protect the character and scale of existing residential neighborhoods.	**No conflict.** The six-story building would front on Sepulveda Boulevard. The area surrounding the Project Site is generally characterized by one- to five-story commercial and multi-family development. The Project would maintain a consistent frontage with active ground-floor uses and a landscaped buffer area on the Sepulveda frontage. The Project includes varied materials and colors to break up the building bulk and massing. Further, the Project is thoughtfully designed given the adjacency of the elementary school and smaller scale commercial uses with a large break in massing on the southern façade and expansive open space areas. The building is carefully arranged to follow the strong, linear form of the site with a modest design that draws the massing away from adjacent lower scale properties.
Objective 1-5. To promote and ensure the provision of adequate housing for all persons regardless of income, age, or ethnic background.	**No conflict.** The Project would support this policy by providing 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in the Van Nuys-North Sherman Oaks Community Plan area.
Policy 1-5.1. Promote greater individual choice in type, quality, price, and location of housing.	**No conflict.** The Project would support this policy by providing 405 dwelling units, including 41 deed-restricted affordable housing units for Extremely Low-Income Households, in the Van Nuys-North Sherman Oaks Community Plan area. The Project would

Table 5.12
Consistency with the Van Nuys-North Sherman Oaks Community Plan

Objectives and Policies[a]	Project Consistency
	include 94 studios, 195 one-bedroom, 115 two-bedroom, and one (1) three-bedroom units.
Transportation	
Objective 11-2. Increase work trips and non-work trips made on public transit.	**No conflict.** The Project provides a residential use within walking distance of a well-developed transit system, as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for residents to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists.

[a] *City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan, September 1998.*
Source (table): EcoTierra Consulting, 2022.

As shown in Table 5.13, *Consistency with Applicable Design Policies of the Van Nuys-North Sherman Oaks Community Plan*, the Project would implement a number of applicable commercial, residential, and design and landscaping policies and, accordingly, would be consistent with the applicable design policies in Van Nuys-North Sherman Oaks Community Plan.

Table 5.13
Consistency with Applicable Design Policies of the
Van Nuys-North Sherman Oaks Community Plan

Policies[a]	Project Consistency
Multiple Residential 1. Site Planning	
1. Provide a pedestrian entrance at the front of each project.	**No conflict.** Pedestrian access to the Project would be provided from the west and east sides of the Project frontage from the sidewalks along Sepulveda Boulevard and Columbus Avenue.
2. Requiring usable open space for outdoor activities, especially for children.	**No conflict.** The Project provides 32,866 square feet of open space, including both indoor and landscaped outdoor areas. The common open space areas include terraces, gyms, recreation and community rooms, a second level courtyard with a pool adjacent community room, and a roof deck with seating and barbeque areas.
Multiple Residential 2. Design	
1. Requiring the use or articulations, recesses, surface perforations and/or porticoes to break up long, flat building facades.	**No conflict.** The Project's architecture has been designed and configured to reflect the manner in which residents live and interact with their neighboring community. Each side of the building contains windows, architectural vertical features, and balconies. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass. Specifically, the Project has been designed with regard to the adjacent elementary

Table 5.13
Consistency with Applicable Design Policies of the
Van Nuys-North Sherman Oaks Community Plan

Policies[a]	Project Consistency
	school and smaller scale commercial uses with a large break in massing on the southern façade and expansive open space areas.
2. Utilize complementary building materials on building facades.	**No conflict.** The lobby area on the ground floor is finished with tint glass panels, aluminum storefront systems, and painted stucco. Those portions of the ground floor that are not composed of glass are wrapped with a wire mesh vine panels for vertical growing landscaping. Thereby, differentiating the lower level area from the upper floors which contain balconies and windows, providing articulation and breaks in plane.
3. Incorporating varying design to provide definition for each floor.	**No conflict.** In accordance with the Citywide Design Guidelines, the Project provides a variety of architectural materials and building planes while creating a pedestrian-scaled project at the street level with glass and varietal materials. The lobby area on the ground floor is finished with tint glass panels, aluminum storefront systems, and painted stucco, differentiating the lower façade from the podium levels and articulated balconies of the apartments above. The glass provides a change in material and additional transparency at the pedestrian level to promote public safety and to add interest for the ground-floor viewer. Those portions of the ground floor that are not composed of glass are wrapped with a wire mesh vine panels for vertical growing landscaping. Thereby, differentiating the lower level area from the upper floors which contain balconies and windows, providing articulation and breaks in plane.
4. Integrate building fixtures, awnings, or security gates, into the design of building(s).	**No conflict.** Building fixtures, awnings, and security fences and gates would be integrated into the Project.
5. Screening all roof top equipment and building appurtenances from adjacent properties.	**No conflict.** The Project building is proposed to be six stories, 66 feet. All rooftop equipment would be screened from potential public view.

[a] City of Los Angeles, Van Nuys-North Sherman Oaks Community Plan, September 1998.
Source: EcoTierra Consulting, 2022.

Planning and Zoning Code

All on-site development activity is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City. The Project Site is currently zoned [Q]R4-1-RIO ([Qualified Condition] Multiple Dwelling, Height District 1, River Improvement Overlay).

Land uses allowed in the R4 Multiple Dwelling zone include a variety of community commercial uses (including churches, child care facilities, hotels, motels, schools, museums, libraries, and retirement hotels, etc.) as well as any residential land use allowed in the R3 zone (including multiple family dwellings) with a minimum lot area of 400 square feet per dwelling unit).[86] Per Ordinance No. 170,031, the [Q] condition changed the zoning designation from [Q]R5-1 to [Q]R4-1 and all development is subject to Condition Nos. 2 and 3 in Ordinance No. 143,733. Condition No. 2 prohibits vehicular access from Columbus Avenue and Condition No. 3 requires the landscaping setback area adjoining Columbus Avenue to be extended northerly to the north boundary of the Project Site.[87]

As previously discussed in Section I, Aesthetics, the Project Site is also located within a RIO District, which requires new development projects to meet development regulations addressing landscaping, screening and fencing, and lighting, and orientation in association with the Los Angeles River. As shown in Appendix A.2 of this SCEA, the landscape plans shows design elements included as part of the Project specifically to meet the Los Angeles RIO District regulations, including landscaping with native trees, plants and shrubs; recreational amenities, such as a swimming pool and deck, outdoor areas for lounging, and indoor amenities, such as fitness and recreational rooms. Prior to issuance of a building permit, the Project Applicant would be required to consult with the Department of City Planning to obtain an Administrative Clearance for compliance with all of the applicable regulations of the Los Angeles RIO District. As such, the Project would be required to comply with the Los Angeles RIO District.

Measure JJJ was approved by the City's voters on November 11, 2016, and became effective as law when the vote results were certified by the Los Angeles City Council on December 13, 2016. Section 6 of the Measure instructed the Department of City Planning to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program, a transit-based affordable housing incentive program. Measure JJJ required that the Department adopt a set of TOC Guidelines, which establish density increases, parking reductions, and development incentives and concessions for residential or mixed-use projects that contain affordable housing units and that are located within a half-mile of a major transit stop. Major transit stops as defined under existing State law.

The TOC Guidelines, adopted on September 22, 2017, establish a tier-based system with varying density increases and development incentives based on a project's distance from different types of transit. The largest increases are reserved for those areas in the closest proximity to significant rail stops or the intersection of major bus rapid transit lines. Required affordability levels are increased incrementally in each higher tier. The TOC Guidelines describe the range of density increases and development incentives that applicants may select.

Each lot within a TOC Affordable Housing Incentive Area is determined to be in one of four tiers based on the shortest distance between any point on the lot and the classification of the nearest

[86] LAMC Section 12.11.A.

[87] City of Los Angeles, Ordinance No. 143,733, September 16, 1972, and Ordinance No. 170,031, November 2, 1994.

qualified Major Transit Stop. An applicant is responsible for providing documentation showing that the location qualifies as a Major Transit Stop and for providing a radius map showing the distance to the Major Transit Stop. The Project has been verified by the City to be in Tier 3 due to its proximity to the Metro bus stops for Metro Route 165, and the Metro Next Gen Rapid Bus Line 234, on the southwest and northwest corners of Vanowen Street and Sepulveda Boulevard.[88]

Housing developments are eligible for TOC incentives if a project meets certain requirements identified in the TOC Guidelines. Since the Project would deed-restrict ten percent (41 dwelling units) of the proposed 405 dwelling units for Extremely Low-Income Households and is within a half-mile of a Major Transit Stop, the Project is eligible for TOC Guidelines base incentives. In addition, since the Project's 41 deed-restricted Extremely Low-Income units represent ten percent of the by total unit count, the Project is eligible for up to two TOC Guidelines additional incentives.

Density

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.11 C.4, the permitted residential density in the R4 zone is one dwelling unit per 400 square feet of lot area. The Project Site has a total lot area of approximately 94,951 square feet which would allow a total of 238 units. With the provision of 10 percent of the total number of units, or 41 units, restricted as affordable for Extremely Low-Income households, the Project qualifies for a TOC base incentive to increase density by 70 percent for a total of 405 units.

Floor Area Ratio and Height

Pursuant to Los Angeles Municipal Code (LAMC) Section 12.21.1 A.1, the permitted floor area ratio (FAR) in the R4 zone in Height District 1 is 3.0 to 1. The Project Site has a lot area of approximately 94,951 square feet and a Buildable Area of approximately 84,547 square feet which would allow a total floor area of up to 253,641 square feet. The Project is requesting a TOC Tier 3 base incentive to allow an increase in FAR of up to 50 percent. With the base incentive, the Project would be permitted a FAR of 4.5:1 or 380,461 square feet. The Project includes 268,770 square feet of floor area resulting in an FAR of 3.18:1.

Height

The LAMC does not require a height or story limit for buildings in the R4 zone within Height District 1. The Van Nuys – North Sherman Oaks Community Plan Map designates the Project Site as General Commercial land use with Footnote 2. "Height District No. 1VL (three stories)." LAMC 12.21.1 A states that a building in Height District No. 1VL in the R4 zone is limited to 45 feet in height, but a building used entirely for residential purposes is not limited as to the number of stories. The Applicant is utilizing a TOC Tier 3 additional incentive to increase height by up to 22 feet which would allow a height of 67 feet. The Project proposes a total building height of 66 feet and 6 stories.

[88] Department of City Planning Case Number PAR-2018-2995-TOC.

Setbacks

In the R4 zone, the required yard setbacks are as follows: front – 15 feet; side – five feet plus one foot for every story over two, or nine feet; rear – 15 feet plus one foot for every story over three or 18 feet. The Project includes the following yard setbacks: front – 18 feet 7 inches; side (north) – nine feet; side (south) – 28 feet; and rear – 18 feet. Therefore, the Project meets the yard setback requirements.

Parking

The City's TOC Guidelines allow residential parking reductions to a minimum of 0.5 space per bedroom for TOC Tier 3 projects. Pursuant to the LAMC 12.21.4, the Project would be required to provide 624 vehicular parking spaces. With utilization of a TOC Guidelines base incentive parking reduction, required vehicular parking would be reduced to 203 vehicular parking spaces. The Project would include 556 vehicular parking spaces, which would meet and exceed the number of required vehicular parking spaces.

With regard to bicycle parking, LAMC requires one long-term bicycle parking space per dwelling unit and one short-term space per 10 dwelling units for the first 25 dwelling units, one long-term bicycle parking space per 1.5 dwelling units and one short-term space per 15 dwelling units for dwelling units 26-100, one long-term bicycle parking space per 2.0 dwelling units and one short-term space per 20 dwelling units for dwelling units 101-200, and one long-term bicycle parking space per 4.0 dwelling units and one short-term space per 40 dwelling units for dwelling units 201-405.[89] Thus, the Project is required to provide 176 long-term bicycle parking spaces[90] and 18 short-term bicycle parking spaces.[91] The Project would provide 176 long-term and 18 short-term bicycle parking spaces consistent with LAMC requirements.

Open Space

The Project's required amount of open space was calculated pursuant to LAMC Section 12.21.G, based on the size and number of dwelling units. The Project proposes 405 residential units. For each studio and one-bedroom unit, 100 square feet of open space is required. For each two-bedroom unit (includes one-bedroom with den units), 125 square feet of open space is required. For each three-bedroom unit, 175 square feet of open space is required. Thus, a total of 43,750 square feet of open space is required for the Project.[92] As a TOC additional incentive, the Project Applicant is requesting a 25 percent reduction in open space requirement, which reduces the requirement to 32,813 square feet. The Project would provide approximately 32,866 square feet

89 Per Ordinance No. 185,480, effective May 9, 2018.

90 Long-Term: For units 1-25, 1 space per unit equals 25 spaces; for units 26-100, 1 space per 1.5 units equals 50 spaces; for units 101-200, 1 space per 2.0 units equals 50 spaces; for units 201-405, 1 space per 4.0 units equals 51 spaces. 25 + 50 + 50 + 51 = equals 176 long-term bicycle parking spaces for residences required.

91 Short-Term: For units 1-25, 1 space per 10 units equals 3 spaces; for units 26-100, 1 space per 15 units equals 5 spaces; for units 101-200, 1 space per 20 units equals 5 spaces; for units 201-405, 1 space per 40 units equals 5 spaces. 3 + 5 + 5 + 5 = 18 short-term bicycle parking spaces for residences required.

92 277 studios and one-bedroom units, which multiplied by the 100-square-foot requirement equals 27,700 square feet of required open space. 127 two-bedroom units (includes one-bedroom with den units), which multiplied by the 125-square-foot requirement equals 15,875 square feet of required open space. 1 three-bedroom units, which multiplied by the 175-square-foot requirement equals 175 square feet of required open space. Total required open space is 27,700 + 15,875 + 175 = 43,750 square feet.

of common open space. In addition, in conformance with LAMC Section 12.21.G, 25 percent of the provided common open space would be landscaped, or a minimum of 4,624 square feet.

Therefore, the Project would be consistent with the City's Planning and Zoning Code, including the provisions of the TOC Affordable Housing Incentive Program (LAMC Section 12.22.A.31) and the City's adopted TOC Guidelines.

Citywide Design Guidelines

As previously discussed in Section I. Aesthetics of this SCEA, the Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Project conforms to the Citywide Design Guidelines (adopted by City Planning Commission October 24, 2019), as shown in Table 5.1, *Citywide Design Guidelines,* in Section I. Aesthetics of this SCEA.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the land use and planning analysis above, including community division, consistency with land use plans, and consistency with habitat conservation plans. The cumulative impacts land use study area is the extent of the Related Projects and the Community Plan area.

With respect to community division and habitat conservation plans, it is unknown whether or not any of the Related Projects or other development in the Community Plan area would divide an existing community or conflict with a habitat conservation plan. However, as the Project would have no impact with respect to community division and habitat conservation plans, it would not contribute to a cumulative impact.

Development of the Related Projects is expected to occur in accordance with adopted plans and regulations. In addition, it is reasonable to assume that the Related Projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. ***Therefore, cumulative land use impacts would be less than significant***.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.

b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:

1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable

2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.

3) Design transportation network improvements in a manner (such as

buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.

4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

Applicability to the Project

The Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, Mitigation Measure PMM MIN-1 is not applicable to the Project.

Impact Analysis

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource and the project converted an existing or potential future regionally-important mineral extraction use to another reuse or if the project affected access to a site used or was potentially available for regionally-important mineral resource extraction.

No mineral extraction operations currently occur on the Project Site.[93, 94, 95] Additionally, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field

[93] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

[94] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012, www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Report_201807.pdf. Accessed October 2022.

[95] City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A. Mineral Resources. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed October 2022.

or oil drilling area.[96,97] ***The Project would not result in the loss of availability of a known mineral resource and no impact would occur***.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As discussed above under responses to Section XII(a), the Project Site is not within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey. The Project would not affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. The Project Site is also not located within a City designated oil field or oil drilling area. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. ***Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and no impact would occur***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the mineral resources analysis above, including loss of availability of a known mineral resource or locally important mineral resource recovery site. The cumulative impacts mineral resources study area is the extent of the Related Projects.

It is unknown whether or not any of the related project sites contain mineral resources. However, as the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Furthermore, no known mineral resources or extraction operations for such resources are in the Project vicinity. ***Therefore, there would be no cumulative impact on mineral resources***.

[96] City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E: Oil Field & Oil Drilling Areas, May 1994.

[97] California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.37122/34.06442/19. Accessed October 2022.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM NOI-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from noise as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Install temporary noise barriers during construction.

b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.

d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and

construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

f) Designate an on-site construction complaint and enforcement manager for the project.

g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.

j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.

k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned.

l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.

n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

q) Use of portable barriers in the vicinity of sensitive receptors during construction.

r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.

s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.

t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.

v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.

y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

Applicability to the Project

Consistent with NOI-1(a), based on Project-specific analysis of the proposed on-site construction activities as well as the specific locations of off-site noise-sensitive receptors, the Project would incorporate site-specific measures, as outlined in the Project Mitigation Measure NOI-MM-1, to address the potentially significant on-site construction noise impact. As this measure addresses specific site conditions, it would be equivalent to and more effective and tailored to the project than PMM NOI-1 in mitigating the potentially significant impacts. In addition, the Project would adhere to all relevant regulatory compliance measures regarding noise, including those outlined in the LAMC and the Noise Element of the City of Los Angeles General Plan, which would be equivalent to or more effective that the measures outlined in PMM NOI-1. Thus, PMM NOI-1 would not be incorporated into the Project and would be replaced by NOI-MM-1.

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

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

a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.

b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.

c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

Applicability to the Project

As analyzed below, the Project could result in significant impacts related to construction vibration. However, based on Project-specific analysis of the proposed on-site construction activities as well as the specific locations of off-site noise-sensitive receptors, the Project would incorporate site-specific measures, as outlined in NOI-MM-2 and NOI-MM-3, to address the significant construction vibration impact. As these measures addresses specific site conditions, it would be consistent with and more effective and tailored to the project than PMM NOI-2 in mitigating the potentially significant impacts. Thus, while some of the measures outlined in PMM NOI-2 would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, incorporation of NOI-MM-2, NOI-MM-3 together with existing regulatory requirements would be equivalent to or more effective than the measures outlined in PMM NOI-2. Thus, PMM NOI-2 would not be incorporated into the Project but would be replaced by NOI-MM-2 and NOI-MM-3.

Impact Analysis

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant with Mitigation Incorporated. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the State have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and State agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 decibels (dBA) CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new

residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

Goal A city where noise does not reduce the quality of urban life.

Objective 1 Reduce airport and harbor related noise impacts.

Objective 2 Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Objective 3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. In accordance with the City's Noise Element, a noise exposure of 60 dBA CNEL or less is considered to be the most desirable target for the exterior of noise-sensitive land uses, or sensitive receptors, such as homes, schools, churches, libraries, etc. It is also recognized that such a level may not always be possible in areas of substantial traffic noise intrusion. Exposures up to 70 dBA CNEL for noise-sensitive uses are generally considered conditionally acceptable if all measures to reduce such exposure have been taken. Noise levels above 70 dBA CNEL are normally unacceptable for residential uses. For conditionally acceptable exterior noise levels, new construction, or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as HVAC equipment and trash enclosure activity are typically evaluated against standards established under a jurisdiction's Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from commercial noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Section 114.03 prohibits loading or unloading any vehicle, or operate dollies, carts, forklifts, or other wheeled equipment causing impulsive sound, raucous or unnecessary sound within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M of the following day. Also, Section 114.06 prohibits installation, operation

or use of any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.

City of Los Angeles Construction Noise Standards

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment. However, the above limitation does not apply where technically infeasible (i.e., the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):
  - are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
  - range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
  - already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Operational Stationary-Source Noise

- If Project-related operational (stationary source) noise levels exceed the exterior ambient noise levels at adjacent sensitive receiver locations by 5 dBA Leq (LAMC § 112.02).

Construction Noise and Vibration

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment. However, the above limitation does not apply where technically infeasible (i.e., the noise limitation

cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

In addition, per the 2006 City of Los Angeles Draft *L.A. CEQA Thresholds Guide*, the City uses the following as guidance for determining whether a project may normally have a significant impact on noise levels from construction, if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at anytime on Sunday.

The City currently does not have significance criteria to assess vibration impacts during construction. Thus, Federal Transit Administration (FTA) guidelines set forth in FTA's Transit Noise and Vibration Assessment, dated September 2018, are used to evaluate potential impacts related to construction vibration for both potential building damage and human annoyance. The FTA guidelines regarding construction vibration are the most current guidelines and are commonly used in evaluating vibration impacts.

Based on this FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

- Project construction activities cause ground-borne vibration levels to exceed 0.5 PPV at the nearest off-site reinforced-concrete, steel, or timber building.
- Project construction activities cause ground-borne vibration levels to exceed 0.3 PPV at the nearest off-site engineered concrete and masonry building.
- Project construction activities cause ground-borne vibration levels to exceed 0.2 PPV at the nearest off-site non-engineered timber and masonry building.
- Project construction activities cause ground-borne vibration levels to exceed 0.12 PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Based on FTA guidance, construction vibration impacts associated with human annoyance would be significant if the following were to occur (applicable to frequent events; 70 or more vibration events per day):

- Project construction activities cause ground-borne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential and hotel uses.

- Project construction activities cause ground-borne vibration levels to exceed 65 VdB at off-site studio (recording/broadcast) uses.

LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level.

Existing Noise Level Measurements

To assess the existing noise level environment, four short-term, 15-minute noise level measurements were taken at sensitive receiver locations in the Project study area and shown on Figure 5.1, *Noise Measurement Locations*. The receiver locations were selected to describe and document the existing noise environment within the Project study area. The 15-Minute Noise Measurement Datasheet (see Appendix J of this SCEA) provides the location of the Project Site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected on November 18, 2022.

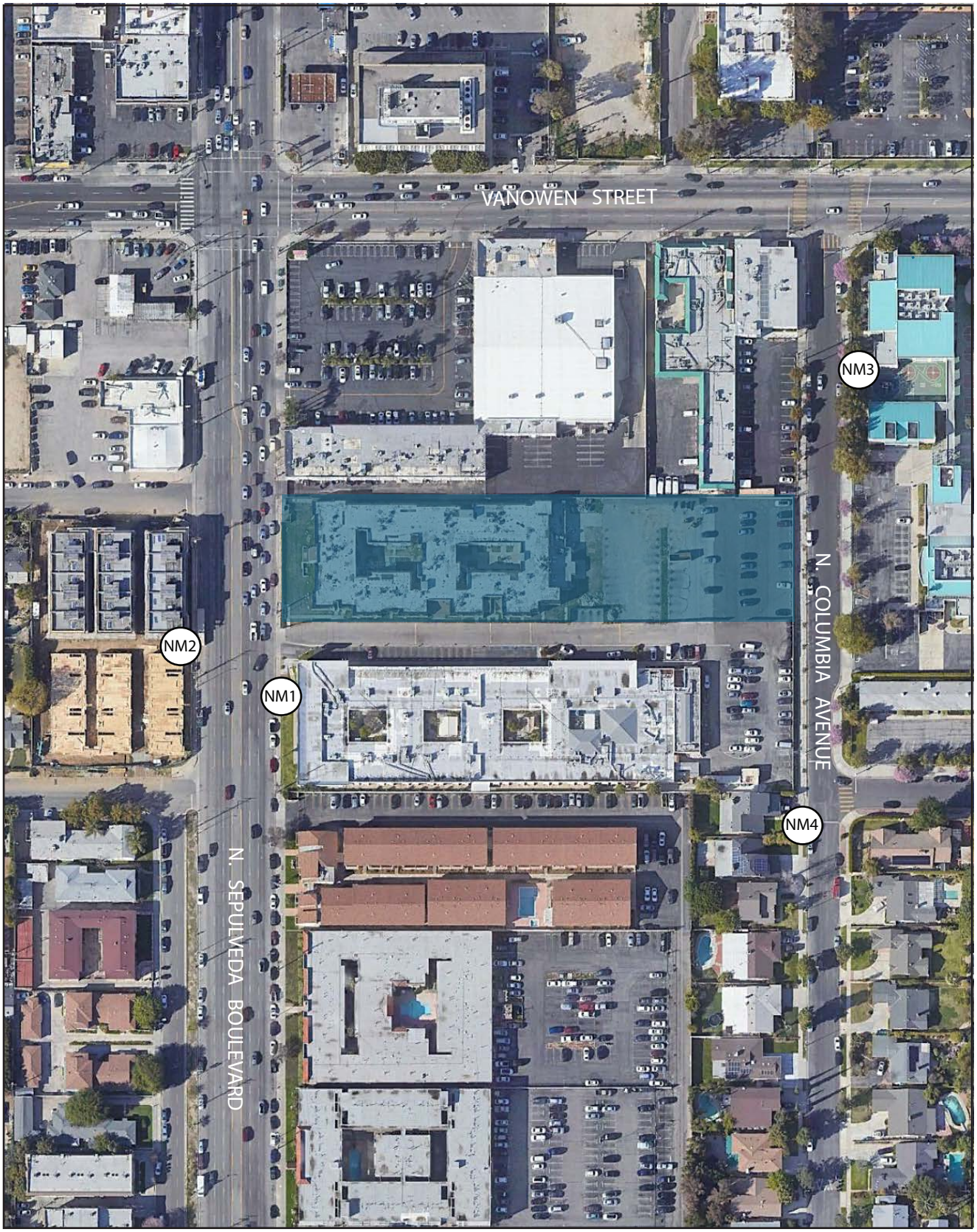
Measurement Procedure and Criteria

The noise measurements were taken using the Larson Davis SoundTrack LxT1 sound level meter, which conforms to industry standards set forth in American National Standard Institute (ANSI) S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1, and is consistent with the requirements specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above the ground. The sound level meter was programmed to record the average sound level (Leq) over a period of 15 minutes in accordance with LAMC Section 111.01(a).

Noise Measurement Locations

The short-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the Project Site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects.

This is demonstrated in the Caltrans general site location guidelines which indicate that, "sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources." Further, FTA guidance states, "it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community."



(NM#) Noise Measurement Locations

Project Site

Source: Google Earth, March 2020.

N

Figure 5.1
Noise Monitoring Locations

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before- and after-Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

Noise Measurement Results

The results of the measurements are summarized in 5.14, *Existing Ambient Noise Levels*. The noise monitoring outputs are provided in Appendix J of this SCEA.

Table 5.14
Existing Ambient Noise Levels

Noise Measurement Location	Location	Primary Noise Sources	Noise Levels [a]		
			L_{eq}	L_{max}	L_{min}
NM1	South of the western portion of the Project Site, adjacent to the Beverly Manor Convalescent Center located at 6700 Sepulveda Blvd	Vehicular traffic travelling along Sepulveda Boulevard, Van Owen Street & other surrounding roads. The local buildings reflect & refract much of the sound. Other noise sources include bird song, residential ambiance, wind chimes, pedestrians. Occasional low altitude aircraft, both fixed wing & helicopters passing overhead. Leaf rustle from nearby trees due to 6 mph breeze. Slight school yard ambiance for NM3 & NM4.	73.1	91.7	54.2
NM2	West of the Project Site, adjacent to the multi-family residential uses located on the western side of Sepulveda Blvd, south of Archwood St.		73.5	85.2	58.6
NM3	Northeast of the Project Site, on the eastern side of Columbus Avenue, next to Columbus Elementary School.		58.3	67.9	48.7
NM4	South of the eastern portion of the Project Site, adjacent to the single family uses west of Columbus Avenue at Lemay Street.		56.1	71.0	42.7

[a] Noise measurements were taken on November 18, 2022, at each location for a duration of 15 minutes. See Appendix J of this SCEA for noise data.
Source: EcoTierra, 2022.

As shown in Table 5.14, the ambient recorded noise levels range from 56.1 dBA Leq to 73.5 dBA Leq in the Project vicinity. Figure 5.1, *Noise Measurements Locations*, available above shows the locations of the noise measurements.

Construction Noise Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project.

The City of Los Angeles General Plan Noise Element defines noise-sensitive uses as: "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks." Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

On-Site Construction Noise

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Demolition
- Foundation/Excavation
- Building Construction
- Architectural Coating

The Project is anticipated to start demolition no sooner than third quarter of 2023, and construction is anticipated to last approximately 28 months, with occupancy projected for the fourth quarter of 2025.

The closest sensitive receptors to the Project Site include:

- Beverly Manor Convalescent Center, located approximately 25 feet to the south of the western portion of the Project Site, at 6700 Sepulveda Boulevard (NM1),
- The multi-family residential uses located approximately 110 feet to the west of the Project Site, west of Sepulveda Boulevard and south of Archwood Street (NM2),
- The Center for Health Living Senior Citizen Center, located south of Vanowen Street, adjacent to the northern boundary on the eastern portion of the Project Site (NM3),
- Columbus Avenue Elementary School, located on the eastern side of Columbus Avenue, approximately 65 feet east of the Site (NM3), and

- The single-family residential uses located approximately 170 feet south of the Project's southern boundary, on the western side of Columbus Avenue at Lemay Street (NM4).

Other noise sensitive land uses are located further from the Project Site and would experience lower impacts. Construction and demolition noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

A summary of noise level data for a variety of construction equipment compiled by the FTA is presented in Table 5.15, *Noise Range of Project Construction Equipment*. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings.

Table 5.15
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical Use Factor (%)	Typical Noise Level at 50 Feet (Lmax dBA)
Compressor (air)	No	40	78
Concrete Mixer Truck	No	40	79
Concrete Pump	No	20	81
Concrete Saw	No	20	90
Crane	No	16	81
Drill Rig	No	20	79
Dozer	No	40	82
Forklift [a, b]	No	50	61
Front End Loader	No	40	79
Generator	No	50	81
Grader	No	40	85
Haul/Dump Truck	No	40	76
Paver	No	50	77
Pickup Truck	No	50	77
Roller	No	20	80
Tractor/Loader Backhoe	No	40	79
Welder/Torch	No	40	74

[a] *Warehouse & Forklift Noise Exposure - NoiseTesting.info Carl Strautins, November 4, 2014, http://www.noisetesting.info/blog/carl-strautins/page-3/*
[b] *Data provided Leq as measured at the operator. Sound Level at 50 feet is estimated.*
Source: FHWA RCNM User's Guide, 2006.

Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. Distances to receptors were based on the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that

every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. The highest noise levels during each construction phase at the closest receptors are presented in Table 5.16, and worksheets are included as Appendix J to this SCEA.

As outlined above, a project may normally have a significant impact on noise levels from construction activities lasting more than 10 days if the noise from the activities would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.

Furthermore, as defined by the Section 41.40 of the LAMC, a project would normally have a significant impact on noise levels from construction if construction activity (including demolition) or repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, occurs between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, or between 6:00 P.M. and 8:00 A.M. on Saturday. Per Section 112.05 of the LAMC, a significant impact on noise levels from construction could also occur if equipment is operated in a manner that causes it to exceed 75 dBA at a distance of 50 feet, between the hours of 7:00 A.M. and 10:00 P.M.

The above noise level limitations do not apply where compliance is deemed to be technically infeasible, which means that said noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction techniques during the operation of the equipment.

Additionally, LAUSD established maximum allowable noise levels to protect students and staff from noise impacts. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of the pre-project ambient level.

The highest Project construction noise levels at the nearest sensitive receptors during construction are shown in Table 5.16, *Construction Noise Levels at Closest Receptor Locations*.

Table 5.16
Construction Noise Levels at Closest Receptor Locations

Receptor Location[a]	Maximum Unmitigated Construction Noise Levels[b]	Applicable Standard (dBA)[c]	Exceeds Standard?
(NM1) Beverly Manor Convalescent Center, south of the Project Site	78.8	78.1	**Yes**
(NM2) Multi-family Residential to the west of the Project Site	67.0	78.5	No
(NM3) Columbus Avenue Elementary School to the east of the Project Site	66.9	61.3	**Yes**
(NM3) Center for Healthy Living Senior Citizen Center, north of the Project Site	72.8	63.3	**Yes**
(NM4) Single family uses located south of the Project Site, west of Columbus Avenue at Lemay Street.	68.7	61.1	**Yes**

[a] *Noise measurement locations are shown on Figure 5.1.*
[b] *Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix J to this SCEA.*
[c] *The applicable City standard is 5 dBA above ambient noise levels for all sensitive receptors other than for Columbus Avenue Elementary School, which has a threshold of 3 dBA above ambient noise level as established by LAUSD. See Table 5.14 for ambient noise levels at the closest receptors.*
Source: EcoTierra, 2022.

As shown in Table 5.16, the highest construction noise levels (which would occur during the foundation/excavation phase) would exceed the 5 dBA above ambient threshold at all of the closest receptors except the multi-family residential use located west of the Project Site (NM2). Further, construction noise levels will exceed the 75 dBA_{leq} noise threshold defined by the Section 41.40 of the LAMC at the Beverly Manor Convalescent Center (NM1). The construction noise level during demolition, foundation/excavation and building construction phases would exceed the 3 dBA above ambient noise level threshold set by the LAUSD at Columbus Avenue Elementary School (NM3). Therefore, construction noise impacts are potentially significant and mitigation measures are required.

Table 5.17, *Mitigated Construction Noise Levels at Closest Impacted Receptor Locations,* shows the noise levels at all the affected sensitive receptors with incorporation of mitigation.

Table 5.17
Mitigated Construction Noise Levels at Closest Impacted Receptor Locations

Receptor Location[a]	Mitigated Construction Noise Levels[b]	Applicable Standard (dBA)[c]	Exceeds Standard?
(NM1) Beverly Manor Convalescent Center, south of the Project Site	68.8	78.1	No
(NM3) Columbus Avenue Elementary School to the east of the Project Site	56.9	61.3	No
(NM3) Center for Healthy Living Senior Citizen Center, north of the Project Site	62.8	63.3	No
(NM4) Single family uses located south of the Project Site, west of Columbus Avenue at Lemay Street.	58.7	61.1	No

[a] *Noise measurement locations are shown on Figure 5.1.*
[b] *Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix J to this SCEA. Noise level reduction with incorporation of mitigation which requires a 10 dBA noise reduction from mufflers and/or shielding for all receptors (except [NM2] Multi-family Residential to the west of the Project Site) during all phases of construction except architectural coating.*
[c] *The applicable City standard is 5 dBA above ambient noise levels other than Columbus Avenue Elementary School, which is has a threshold of 3 dBA above ambient noise level as established by LAUSD. See Table 5.14 for ambient noise levels at the closest receptors.*
Source: EcoTierra, 2022.

As shown above, with incorporation of Mitigation Measure NOI-MM-1, the noise levels at all of the closest sensitive receptors that would be impacted by construction noise, would be reduced by approximately 10 dBA and would not exceed applicable construction noise standards. Such mitigation includes, for example, the use of an acoustical curtain, as a temporary construction noise barrier that blocks the line-of-sight between construction activities and receptors, which can reduce noise impacts by up to 32 dBA.[98] Therefore, a 10 dBA reduction in construction noise through implementation of Mitigation Measure NOI-MM-1, including the use of a temporary construction barrier/curtain, is feasible.

Mitigation Measure NOI-MM-1 would be incorporated to attenuate construction noise levels to receptors located to the north, south and east.

The following mitigation measure is required to reduce the construction noise impacts to sensitive receptors from the use of on-site construction equipment.

[98] Source: https://www.acousticalsurfaces.com/curtan_stop/sound_blankets.htm

Mitigation Measure

NOI-MM-1:

- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices capable of at least a 10 dBA reduction.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- A temporary noise control barrier/sound curtain shall be installed on the northern, eastern and southern property lines of the construction site. The noise control barrier shall be installed to block the line-of-sight from the nearby Senior Citizen Center/Convalescent Center uses, Elementary School use, and closest residential uses to the southeast, to the construction activity, and the barrier shall be designed to reduce construction-related noise levels at the nearby sensitive use structures by at least 10 dBA. The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until all windows have been installed and all exterior noise producing construction activities on the project site are complete.

Therefore, with compliance with City noise regulations and incorporation of Mitigation Measure NOI-MM-1 (as shown by the results in Table 5.17 above), construction noise impacts would be less than significant.

Implementation of the noise attenuation measure NOI-MM-1 provided above would ensure the Project would not exceed City of Los Angeles construction noise thresholds, be consistent with the LAMC, and construction noise impacts would be less than significant.

Off-Site Construction Noise

The highest potential for off-site construction noise is sourced from hauling trips. During the demolition duration of 20 days, the Project would generate approximately 1 haul truck trip per day travelling to and from the Project Site. During the foundation/excavation duration of 180 days, the Project would generate approximately 54 haul truck trips per day travelling to and from the Project Site. The anticipated haul route to and from the Project Site would be along Sepulveda Boulevard, to Sherman Way, to the 405 freeway. There are commercial buildings, some scattered multi-family dwellings and hotels along the route. Building frontages along the haul route are located approximately 50 feet or more from the roadway center line. As shown in Table 5.15 above, typical noise from haul trucks driving by can reach up to 76 dBA_{Lmax} at a distance of 50 feet. As the multi-family and senior apartment uses are located over 50 feet from the roadway centerline, the noise level generated by a Project haul truck passing by would be similar to the ambient noise levels at receptor locations along haul route roadway segments, which can reach up to 91.7 dBA_{Lmax} (see

Table 5.14 above for examples of maximum noise levels adjacent to major roadways). ***Therefore, impacts from off-site construction noise would be less than significant and no mitigation measures are required***.

Operational Noise Impacts

Off-Site Traffic Noise

Existing and Existing Plus Project traffic noise levels were modeled utilizing FHWA Traffic Noise Prediction Model - FHWA-RD-77-108 at a distance of 50 feet from roadway centerline. The uniform distance allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. These worksheets are included as Appendix J to this SCEA. The modeling is theoretical, and is considered conservative because it does not account for any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference in with and without Project conditions. Roadway input parameters are based on ADTs, speeds, and vehicle distribution data. The potential off- site noise impacts caused by an increase of traffic volumes from operation of the Project on the nearby roadways were calculated for the following scenarios:

"Existing" refers to existing year 2022 traffic noise conditions. "*Existing Plus Project"* refers to existing year 2022 traffic noise conditions plus traffic generated by the Project. Both scenarios are demonstrated in Table 5.18, *Off-Site Traffic Noise Impacts– Existing with Project Conditions*.

Table 5.18
Off-Site Traffic Noise Impacts – Existing with Project Conditions

Noise Levels 50 feet from Roadway Centerline*						
	Existing (2022)		Existing Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant?
Sepulveda Boulevard						
n/o Sherman Way	15,930	69.7	15,980	69.7	0.0	**No**
s/o Sherman Way	10,270	67.8	10,520	67.9	0.1	**No**
n/o Vanowen Street	16,250	69.8	16,410	69.9	0.1	**No**
s/o Vanowen Street	8,210	66.8	8,620	67.1	0.3	**No**
n/o Kittridge Street	15,680	69.7	16,090	69.8	0.1	**No**
s/o Kittridge Street	8,390	66.9	8,620	67.1	0.2	**No**
n/o Victory Blvd	16,050	69.8	16,400	69.8	0.0	**No**
s/o Victory Blvd	10,400	67.9	10,470	67.9	0.0	**No**
Sherman Way						
w/o Sepulveda Blvd	19,810	70.7	19,880	70.7	0.0	**No**
e/o Sepulveda Blvd	16,550	69.9	16,590	69.9	0.0	**No**
Vanowen Street						

Table 5.18
Off-Site Traffic Noise Impacts – Existing with Project Conditions

Noise Levels 50 feet from Roadway Centerline*						
	Existing (2022)		Existing Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant?
w/o Sepulveda Blvd	12,340	68.6	12,390	68.6	0.0	**No**
e/o Sepulveda Blvd	11,670	68.4	11,720	68.4	0.0	**No**
Kittridge Street						
e/o Sepulveda Blvd	1,600	59.7	1,680	60.0	0.3	**No**
Kittridge Street						
w/o Sepulveda Blvd	16,880	70.0	16,990	70.0	0.0	**No**
e/o Sepulveda Blvd	14,230	69.2	14,280	69.2	0.0	**No**

Notes: ADT = average daily trips, dB = decibels, CNEL = community noise equivalent level
* *The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.*
Source: EcoTierra, 2022.

A significant impact may occur from traffic noise when the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

As shown in Table 5.18, Project generated vehicular trips from all of the modeled roadway's segments would result in a maximum increase in ambient noise levels of 0.3 dBA[99] over the Existing scenario, and would not exceed the Noise Element threshold standards presented above. ***Therefore, traffic noise impacts to off-site receptors due to Project generated trips would be less than significant and no mitigation measures are required***.

On-Site Operational Noise

This section analyzes the potential on-site operational noise impacts due to the Project's stationary noise sources.

Parking Noise

The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within

[99] As the increase in noise levels is 0.3 dBA CNEL at 50 feet from the centerline, it would also be an increase of 0.3 dBA CNEL at the property line of affected uses.

the parking areas would fluctuate with the amount of automobile and human activity. Activity levels are anticipated to be higher in the early morning and evening when the largest number of residents would enter and exit. However, these events would occur at low exiting and entering speeds, which would not generate high noise levels. During these times, the noise levels can range from 36 to 69 dBA Leq at a distance of 50 feet from the source.[100] Operational noise generated by motor vehicles within the Project Site is regulated under the LAMC. Specifically, Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of the property to exceed the ambient noise level by more than five decibels. LAMC Section 114.06 prohibits any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes. LAMC Section 114.03 prohibits loading or unloading of any vehicle, operating any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. of the following day. As the parking area is subterranean and would be surrounded by the building on all sides, except for the driveway area, noise generated from within the parking area would not adversely affect off-site sensitive receptors. ***Therefore, through project design and compliance with existing LAMC regulations, noise impacts associated with parking would be less than significant and no mitigation measures are required***.

Stationary Noise Sources

As part of the Project, HVAC units, and exhaust fans would be installed for the proposed uses. Although the operation of this equipment would generate noise, the design of all mechanical equipment would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels. ***Therefore, impacts related to stationary noise sources would be less than significant with compliance with existing LAMC regulations. No mitigation measures are required***.

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

Less than Significant with Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be

[100] Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.

continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Standards

The City's General Plan and Municipal Code do not identify specific vibration level standards. Therefore, applicable vibration standards identified by the Caltrans Transportation and Construction Vibration Guidance Manual were used in the analysis. The vibration damage criteria adopted by the FTA are shown in Table 5.19*, Construction Vibration Damage Criteria*.

Table 5.19
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories:

(1) Vibration Category 1 – High Sensitivity,

(2) Vibration Category 2 – Residential, and

(3) Vibration Category 3 – Institutional.

The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The vibration criteria associated with human annoyance for these three land-use categories are shown in Table 5.20, *Groundborne Vibration Criteria for General Assessment*. No thresholds have been adopted or recommended for commercial or office uses.

Significance Criteria

Vibration impacts shall be considered significant if any of the following occur as a direct result of the Project:

- If short-term Project generated construction vibration levels exceed the FTA building damage vibration criteria listed in Table 5.19 or the FTA human annoyance standards for frequent events listed in Table 5.20.

Table 5.20
Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events	Occasional Events	Infrequent Events
Category 1	65 VdB	65 VdB	65 VdB
Category 2	72 VdB	75 VdB	80 VdB
Category 3	75 VdB	78 VdB	83 VdB
Per FTA Transit Noise and Vibration Impact Assessment, September 2018, page 8-1, infrequent events are fewer than 30 vibration events of the same kind per day. Occasional events are between 30 and 70 vibration events of the same source per day. Frequent events are more than 70 vibration events of the same source per day. *Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.*			

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The Project's construction activities most likely to cause vibration impacts are:

- **Heavy Construction Equipment**: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- **Trucks:** Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Table 5.21, *Construction Equipment Vibration Source Levels,* identifies various PPV levels for the types of construction equipment that would operate during the construction of the Project. For example, as shown in Table 5.21, a vibratory roller could generate up to 0.21 PPV at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV) at a distance of 25 feet (two of the most vibratory pieces of construction equipment). Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 PPV. It should also be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table 5.21
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, Table 7-4. September 2018.

Annoyance to Persons

The primary effect of perceptible vibration is often a concern. However, secondary effects, such as the rattling of a china cabinet, can also occur, even when vibration levels are well below perception. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is running on a treadmill. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

Per the FTA Transportation and Construction Vibration Guidance Manual (May 2018), land uses sensitive to vibration include: buildings where people normally sleep, such as dwelling units, hotels, and hospitals; research and manufacturing facilities that are vibration-sensitive such as hospitals with vibration-sensitive equipment and universities conducting physical research operations; and institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, and doctors' offices. Further, the FTA states that commercial or industrial locations including office buildings are not included in this category, unless there is vibration-sensitive activity or equipment within the building.

As shown in Table 5.20, vibration from frequent events can be annoying to Category 2 uses (and any buildings where people sleep) at a level 72 VdB. Per the CalEEMod modeling (provided in Appendix C of this SCEA), a large bulldozer or caisson drill would be the most vibratory pieces of equipment expected to be used at the Project Site. Vibration worksheets are provided in Appendix J of this SCEA.

The nearest sensitive receptors that could be affected by vibration include: the patrons of the Center for Healthy Living Senior Citizen Center whose building is located approximately 10 feet from the Project boundary, the residents of the Beverly Manor Convalescent Center whose building is located approximately 25 feet from the Project Boundary, and the students/teachers on Columbus Avenue Elementary School campus, with the closest campus building located approximately 106 feet from the northeastern corner of the Project Site. To be conservative, this distance represents the closest a piece of equipment could come to the building façade of the sensitive receptors as the equipment passes by the Project boundary. Other vibration sensitive land uses are located further from the Project Site and would experience lower impacts.

At a distance of 10 feet, use of a large bulldozer or caisson drill would be expected to generate 98.94 VdB[101] which would exceed the 72 VdB threshold for Category 2 land uses; therefore, mitigation is required.

At a distance of 80 feet from the façade of the closest sensitive receptor, use of a large bulldozer or caisson drill would generate 71.85 VdB, which would not exceed the 72 VdB threshold for Category 2 land uses. Furthermore, as the closest campus building for the Columbus Avenue Elementary School is located further than 80 feet from the Project boundary, the annoyance-based construction vibration would not exceed the 72 VdB threshold on the school campus.

The following mitigation measure is recommended to reduce the annoyance to sensitive receptors from construction-related vibration levels to the maximum extent feasible.

Mitigation Measure

NOI-MM-2 The construction contractor shall avoid using large bulldozer or caisson drill within 80 feet of the façade of the Center for Healthy Living Senior Citizen Center, located

[101] Based on the 2018 FTA Transit Noise and Vibration Impact Assessment Manual vibration equation 7-3: Lv.distance = Lvref – 30 log (D/25), where Lv.distance is the vibration level adjusted for distance, VdB; Lvref is the source reference vibration level at 25 feet, VdB; and D = distance from the equipment to the receiver. Page 185.

north of the Project Site, and the Beverly Manor Convalescent Center located south of the Project Site.

Architectural Damage

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

Table 5.19, above, identifies a PPV level of 0.2 as the threshold at which there is a risk to non-engineered timber and masonry buildings. The building façade of the closest building, the Center for Health Living Senior Citizen Center, is located approximately 10 feet from the construction activity areas. At a distance of 10 foot, a large bulldozer or caisson drill would generate 0.352 in/sec PPV (see vibration calculations available in Appendix J to this SCEA for details). Therefore, vibration damage to the closest buildings could potentially occur during construction of the Project.

At a distance of 15 feet from building facade, the vibration level from a large bulldozer or caisson drill is 0.191 in/sec PPV. Therefore, to avoid the potential for any structural damage to the adjacent buildings during construction, a bulldozer or caisson drill must not be operated within 15 feet of the facades of existing buildings adjacent to the Project's northern boundary. With the implementation of mitigation measure NOI-MM-3, impacts from groundborne vibration would be reduced to a level of less than significant.

NOI-MM-3 requires that heavy machinery (an excavator or large bulldozer) is not to be used within 15 feet of the adjacent buildings located north of the Project Site. Demolition/construction activity that must occur within these distances to the adjacent buildings' facades would need to be performed with smaller equipment types that do not exceed the vibration thresholds applied herein. As shown above, the estimated maximum vibration levels for the construction of the Project with the use of required setback distance mitigation measure (NOI-MM-3) would be less than significant.

Mitigation Measure

Construction

NOI-MM-3: The construction contractor shall avoid using large bulldozer within 15 feet of the façades of the existing structures located directly adjacent to the northern boundary of the Project.

With incorporation of mitigation measure NOI-MM-3 architectural damage-related vibration impacts to the closest offsite building located adjacent to the Project's northern boundary will be less than significant.

Operational Vibration

The Project proposes the construction of an approximately 268,770 square-foot, 405-unit residential development with subterranean parking. The Project would not involve the use of

stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. ***As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are required.***

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

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

The Project Site is located approximately 1.2 miles southeast of the Van Nuys Airport (16461 Sherman Way, Van Nuys). However, the Project Site is not located within the Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Van Nuys Airport).[102] Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[103] ***Therefore, no impacts would occur, and no mitigation measures are required***.

Cumulative Impacts

Development of the Project in conjunction with other Related Projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized Van Nuys – North Sherman Oaks Community Plan Area of the City of Los Angeles. The Transportation Assessment for the Project identifies 21 Related Projects within the vicinity of the Project Site.[104] The nearest related project is a proposed medical office, located at 15225 Vanowen Street, approximately 379 feet north of the Project Site. The next closest related project is a proposed 30-unit subdivision located at 6705 N. Sepulveda Boulevard, approximately 100 feet southwest of the Project Site. The rest of the Related Projects are located well over 500 feet from the Project Site.

[102] Los Angeles County, Airport Land Use Commission, Van Nuys Airport, Airport Influence Area Map, May 13, 2003.

[103] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004. Accessed: April 2022.

[104] Transportation Assessment for the Residential Project Located at 6728 Sepulveda Boulevard in the City of Los Angeles (Transportation Assessment) prepared by Overland Traffic Consultants, Inc. dated October 2022.

Construction-Related Cumulative Impacts

The project applicant has no control over the timing or sequencing of the Related Projects that have been identified within the proposed project study area. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Construction-period noise and ground-borne vibration for the proposed project and each related project (that has not yet been built) would be localized. Construction of these and other unforeseen projects could potentially combine construction noise and vibration levels with the Project construction activities. However, all Related Projects would be required to comply with the City's Noise Ordinance Nos. 144,331 and 161,574. In addition, each of the Related Projects would be subject to Section 41.40 of the LAMC, which limits the hours of allowable construction activities, and Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. Therefore, with the Related Projects also complying with City requirements regarding construction noise impacts, cumulative construction noise levels will not exceed the City's applicable standard of 75 dBA at the nearby sensitive receptors. ***Therefore, cumulative on-site construction noise impacts under the Project would be less than significant. Implementation of mitigation measure NOI-MM-1, required to reduce Project-related construction noise levels, would further reduce potential cumulative construction noise impacts.***

Due to the rapid attenuation characteristics of groundborne vibration and given the distance to the nearest Related Project to the Project Site, there is no potential for a cumulative construction vibration impact with respect to building damage or human annoyance from cumulative construction vibration. ***Implementation of mitigation measures NOI-MM-2 and NOI-MM-3, required to reduce the potential for human annoyance and building damage from construction-related vibration at the closest buildings, would further reduce potential cumulative construction vibration impacts***.

Operational Cumulative Noise Impacts

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and Related Projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing traffic volumes and future traffic volumes with the proposed project and cumulative development. The increases in roadway noise levels associated with cumulative development are identified in Table 5.22, *Off-Site Traffic Noise Impacts – Cumulative with Project Conditions,* for the roadway segments and peak hours where the Project would have a measurable increase in noise levels.

Table 5.22
Off-Site Traffic Noise Impacts – Cumulative with Project Conditions

Noise Levels 50 feet from Roadway Centerline*						
	Existing (2022)		Future Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant ?
Sepulveda Boulevard						
n/o Sherman Way	15,930	69.7	17,330	70.1	0.4	**No**
s/o Sherman Way	10,270	67.8	11,510	68.3	0.5	**No**
n/o Vanowen Street	16,250	69.8	17,690	70.2	0.4	**No**
s/o Vanowen Street	8,210	66.8	9,260	67.4	0.6	**No**
n/o Kittridge Street	15,680	69.7	16,990	70.0	0.3	**No**
s/o Kittridge Street	8,390	66.9	9,270	67.4	0.5	**No**
n/o Victory Blvd	16,050	69.8	17,270	70.1	0.3	**No**
s/o Victory Blvd	10,400	67.9	11,100	68.2	0.3	**No**
Sherman Way						
w/o Sepulveda Blvd	19,810	70.7	21,280	71.0	0.3	**No**
e/o Sepulveda Blvd	16,550	69.9	17,800	70.2	0.3	**No**
Vanowen Street						
w/o Sepulveda Blvd	12,340	68.6	13,610	69.0	0.4	**No**
e/o Sepulveda Blvd	11,670	68.4	12,840	68.8	0.4	**No**
Kittridge Street						
e/o Sepulveda Blvd	1,600	59.7	1,750	60.1	0.4	**No**
Kittridge Street						
w/o Sepulveda Blvd	16,880	70.0	18,170	70.3	0.3	**No**
e/o Sepulveda Blvd	14,230	69.2	15,320	69.6	0.4	**No**

Notes: ADT = average daily trips, dB = decibels, CNEL = community noise equivalent level
* *The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.*
Source: EcoTierra, 2022.

As shown, the traffic generated by the Project and cumulative development would increase local noise levels by a maximum of 0.6 dBA L_{eq}, which would be imperceptible to most people and would not exceed the City of Los Angeles thresholds of significance. ***Therefore, this cumulative impact would be less than significant.***

As with the localized construction-related noise impacts, all of the other Related Projects are located far enough away that on-site equipment at those locations would have no noise effect on the sensitive residential uses in close proximity to the Project Site. On-site equipment at the Project Site would similarly have no noise effect on any sensitive uses in close proximity to the Related Project sites. ***Therefore, Project would not contribute to cumulative noise impact associated with stationary and on-site operational noise sources***.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.

b) Prioritize the use existing ROWs, wherever feasible.

c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.

d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).

e) When General Plans and other local land use regulations are amended

or updated, use the most recent growth projections and RHNA allocation plan.

Applicability to the Project

As discussed below, the Project would not displace any existing housing units. Therefore, PMM POP-1 is not applicable to 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 Impact. A significant impact may occur if a project were to locate new development such as homes, businesses or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The Project consists of the construction of a 268,770 square-foot, 405 unit (including 41 affordable housing units, which is 10 percent of the total Project units) residential development on a vacant Project Site. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, construction workers on the Project would not represent unplanned population growth, either directly or indirectly. Impacts on population and housing due to Project construction activities would be less than significant.

Operation

Population

The Project, as discussed previously, would include up to 405 multi-family residential units, which could generate approximately 984 residents (405 x 2.43).[105] According to SCAG data, the City of Los Angeles subregion had a total population of 3,933,800 persons in 2016. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 288,790 between 2016 and 2026, and by 548,710 persons between 2026 and 2045. The addition of these new residents would be within the SCAG growth projection, representing approximately 0.34 percent of the Citywide total growth for the period of 2016 to 2026, and approximately 0.18 percent of the Citywide total growth for the period of 2026 to 2045. This increase would not be considered

[105] Based on a Citywide factor of 2.43 residents per dwelling unit.

a substantial increase for the area and is within the anticipated SCAG forecast for population. Therefore, the Project's residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

Housing

With respect to housing, the Project would introduce up to 405 multi-family residential units to the area. Estimates extrapolated/taken from SCAG data projects the Citywide housing supply to increase by 149,900 units between 2016 and 2026, and by 276,100 units between 2026 and 2045. The 405 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.27 percent of the citywide total housing growth for the period of 2016 to 2026, and approximately 0.15 percent of the Citywide total growth for the period of 2026 to 2045. This increase would not be considered a substantial increase in housing for the area as the addition of 405 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. Therefore, the Project's households would be well within SCAG's 2020–2045 household projection for the City of Los Angeles Subregion.

Infrastructure

The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As a result, the development of the Project would not indirectly induce population growth. Because the Project is consistent with General Plan and the Van Nuys-North Sherman Oaks Community Plan, it would not introduce unplanned infrastructure not previously evaluated or anticipated in those plans. Therefore, impacts would be less than significant.

As analyzed above, the new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere.

The Project Site currently is vacant, and, thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. ***Therefore, no impacts would occur****.*

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the topics listed in the

population and housing analysis above, including growth inducement, and housing and population displacement.

Employment, housing, and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The Related Projects identified in Section 3. Project Description of this SCEA and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative employment growth associated with the Project and other development within the City of Los Angeles subregion would be accommodated in SCAG forecasts over time and the Project would not contribute to a cumulatively considerable effect with respect to employment, housing, and population growth. ***Therefore, cumulative impacts would be less than significant.***

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as

applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.

b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.

c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

Applicability to the Project

As analyzed below, existing facilities are capable of providing acceptable fire and emergency response services for the Project. Furthermore, the Project would be subject to existing regulations included in the City's Fire Code and LAMC related to emergency access. In addition, consistent with PMM PSP-1(c), the Project would include Project Design Feature TR-PDF-2, which requires the preparation and implementation of a Construction Traffic Management Plan, which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Adherence to applicable regulatory measures and incorporation of Project Design Feature TR-PDF-2 would be equal to or more effective than PMM PSP-1, and thus, it would not be applicable to the Project.

PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where construction or expansion of school facilities is required to meet

public school service ratios, require school district fees, as applicable.

Applicability to the Project

Consistent with PMM PSS-1 and as discussed below, the Project Applicant shall pay required school fees to the Los Angeles Unified School District pursuant to SB 50. As the existing regulatory requirement providing for the payment of school fees would be equal to or more effective than PMM PSS-1, this measure is not applicable to the Project.

PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.

Applicability to the Project

Consistent with the above measure, the Los Angeles Public Library (LAPL) was contacted, the results of which determined although the increase of on-site population that would occur with the development of the Project could increase demand for library materials, the increase in residential population would not result in a demand for new or expanded library facilities. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project. Therefore, PMM PSL-1 is not applicable to the Project.

Impact Analysis

a. Fire protection?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of LAFD considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between high-density residential land uses (which is likely the most appropriate land use category for the Project) and a LAFD fire station that houses an engine company is 1.5 miles, and 2.0 miles from a station that houses a truck company. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

Construction

The Project is a residential development and does not involve the construction or physical alteration of a fire station.

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, OSHA has developed safety and health provisions for implementation during construction, which are set forth in Title 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[106] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[107] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. The Project would be required to implement standard BMPs set forth by the City and the RWQCB, which would ensure that waste generated during the construction process are disposed of properly. Compliance with these regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

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 potentially requiring partial lane closures during street improvements and utility installations. In addition, the Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of grading and construction activity. The Work Area Traffic Control Plan would minimize the potential for conflicts or impairment of an emergency response or evacuation.

Moreover, construction impacts are temporary in nature and do not cause lasting effects that would impact LAFD fire protection services. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated

[106] United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

[107] United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

fire facilities would be needed in order to maintain response distances, emergency access, or other performance objectives of the LAFD.

Given the short-term nature of construction, the controlled nature of the construction activities, and the fire stations that are readily available to serve the Project Site, Project construction would not require the provision of or need for new or altered fire protection facilities, in order to maintain acceptable fire services.

Operation

Response Distance and Time

The Project Site is served primarily by Fire Station No. 39, located at 14615 Oxnard Street, approximately 1.8-miles to the southeast of the Project Site.[108] Fire Station No. 39 includes two Engine Trucks, a Truck Company, a Rescue Ambulance, a Rescue Truck, and a Battalion Commander Sedan.[109] Although not within the 1.5 miles maximum response distance for engine companies, the Project is within the 2.0 miles maximum response distance for truck companies. Therefore, the Project would install automatic fire sprinkler systems in the proposed residential use.

The Court of Appeal in *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th 833 clarified that significant impacts related to fire protection services must include an adverse changes in any of the physical conditions within the area of a project, and potential impacts on emergency response times are not an environmental impact that CEQA requires a project applicant to mitigate. Delay in emergency response times and the need for additional fire protection services without an adverse physical environmental change are not environmental impacts that CEQA require a project applicant to mitigate. A City is obligated to provide adequate fire and emergency medical services under the California Constitution. Therefore, the following discussion of response times is provided for informational purposes only.

Response time relates directly to the physical linear travel distance (i.e., the number of roadway-miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time. The LAFD created FireStatLA in 2014 to track and evaluate response time data in order to improve response times citywide. Response metrics for January through September 2022 show that Fire Station No. 39 had an average response time for non-EMS calls of 4 minutes and 52 seconds, and 5 minutes and 13 seconds for EMS calls.[110]

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[108] Los Angeles Fire Department, Find Your Station, https://www.lafd.org/fire-stations/station-results. Accessed October 2022.

[109] California Fire and EMS, http://www.cafirefighters.com/lafd.htm. Accessed October 2022.

[110] City of Los Angeles Fire Department, Fire Stat LA, https://www.lafd.org/fsla/stations-map?station=39&year=2022#. Accessed October 2022.

LAFD has not formally established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standards of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response (as established for fire department turnout time and travel time, which does not include call intake, processing, or transfer, or dispatch).[111] According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[112] The City has over 205 miles of major arterial routes that are equipped with FPS.[113]

Vehicular access to the Project Site is currently provided via one driveway on Sepulveda Boulevard with additional access for emergency purposes only from Columbus Avenue. Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., Sepulveda Boulevard, Vanowen Street, and Columbus Avenue). All improvements proposed would be in compliance with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation.

Fire Flow

The LADWP currently provides water for fire flow to the Project area. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction).

Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements for high density residential land uses is 4,000 gallons per minute (gpm) from four fire hydrants flowing simultaneously. A minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. A LADWP Fire Service Pressure Flow Report (SAR) indicated that with the implementation of a six (6) inch fire service connection

[111] NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition.

[112] Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet.

[113] Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

infrastructure would be sufficient to serve the Project Site.[114] The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Project Site.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 300-450 feet of high-density residential uses. The nearest fire hydrants to the Project Site are located in the right-of-way of Sepulveda Boulevard just north of the Project Site and in the right-of-way of Columbus Avenue just north of the Project Site.[115] Notwithstanding these existing hydrants, if LAFD were to determine that additional fire hydrants are required during its review of the building design and LAFD requirements, such improvements would be completed as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and of short duration and would not result in any significant environmental impacts.

As detailed above, prior to plan check review, the Project would be required to consult with the LAFD regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project Site. All required fire protection features would be installed to the satisfaction of the LAFD.

Based on the analysis above, Project construction and operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit emergency response. Therefore, construction and operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services, and impacts would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the fire protection analysis above. The cumulative impacts fire protection study area is the extent of the Related Projects and the service area of Fire Station 39.

Development of the Project in combination with the Related Projects would cumulatively increase the demand for fire services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing,

[114] Utility Report for 6728 Sepulveda Apartments, Appendix A, prepared by Labib Funk + Associates, August 29, 2022, Appendix L to this SCEA.

[115] City of Los Angeles Geo Hub, fire hydrant locations, https://geohub.lacity.org/datasets/fire-hydrants-dwp/explore?location=34.064408%2C-118.370576%2C19.00. Accessed October 2022.

equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Project and Related Projects would contribute. Moreover, all of the cumulative development would be reviewed by the LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. It is unknown whether or not any of the Related Projects would require new or expanded fire stations. If there were a fire protection impact due to the combined impacts of the Related Projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. ***Therefore, the cumulative impact would be less than significant.***

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective.

The Project Site is located in the Los Angeles Police Department's (LAPD) Valley Bureau. The Project would be served by the Van Nuys Community Police Station, located at 6240 Sylmar Avenue, approximately 1.8-miles to the southeast of the Project Site. The Project Site is located in Reporting District 0923.[116] The geographic area of the Van Nuys Community Police Station covers approximately 30 square miles and consists of 98 Reporting Districts. The service boundaries for the Van Nuys Station are: Victory Boulevard to the north, the Orange Line Busway to the south, Hazeltine Avenue to the east, and Van Nuys Boulevard to the west. The community has a population of approximately 325,000 people.[117]

The Van Nuys Police station currently has 240 sworn personnel and 14 civilian support staff assigned with an officer-to-population ratio of one officer per approximately 993 residents.[118] Based on LAPD's estimated total Van Nuys Station population of 325,000, the LAPD Van Nuys Community Police Station currently has an officer-to-resident ratio of 0.7 officers for every 1,000 residents (240 officers/325,000 residents = 0.0007 x 1,000 = 0.7). Additionally, there are special service teams available within the LAPD to service the Van Nuys Area.[119] No official standard has been set by the City with respect to officer to population ratio.

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116 Written Correspondence from Officer Jeff Nelson, Public Engagement Section, Los Angeles Police Department, dated May 11, 2023, Appendix K of this Initial Study.

117 Written Correspondence from Officer Jeff Nelson, Public Engagement Section, Los Angeles Police Department, dated May 11, 2023, Appendix K of this Initial Study.

118 Written Correspondence from Officer Jeff Nelson, Public Engagement Section, Los Angeles Police Department, dated May 11, 2023, Appendix K of this Initial Study.

119 Written Correspondence from Officer Jeff Nelson, Public Engagement Section, Los Angeles Police Department, dated May 11, 2023, Appendix K of this Initial Study.

The Van Nuys Station's emergency response system is directly linked to the Los Angeles Police Department Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). Communication Division handles only police related calls for the City. The average response time to emergency calls for service in Van Nuys Area was 4.1 minutes.[120]

Construction

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

Operation

Operation of the Project could result in an on-site population of approximately 984 persons, thereby generating a potential increase in the number of service calls from the Project Site.[121] Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. Following development of the Project the residential service population would increase to 325,984 residents resulting in an approximate officer-to-resident ratio of 1.36 officers per 1,000 residents (240 officers/325,984 residents = 0.0007 x 1,000 = 0.7). This represents no change in the officer-per-resident ratio of the service area. Furthermore, as required by the City as a regulatory compliance measure, the Project would implement principles of the City's *Crime Prevention through Environmental Design Guidelines* subject to the approval of LAPD prior to the issuance of building permits.[122] Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Additionally, the continuous visible and non-visible presence of residents and employees would provide a sense of security during evening and morning hours. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts.

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120 Written Correspondence from Officer Jeff Nelson, Public Engagement Section, Los Angeles Police Department, dated May 11, 2023, Appendix K of this Initial Study.

121 Refer to Section XIV. Population and Housing, of this SCEA.

122 City of Los Angeles Police Department, Design Out Crime, https://www.lapdonline.org/design-out-crime/. Accessed: February 2022.

Although there are no known police station construction or facilities expansion projects planned for the Project area, in the event that the City determines that expanded or new police facilities are warranted, 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 under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Furthermore, as with fire services, if the demand for police services in a given area increases, it is the LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including police protection services.

Based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Thus, impacts with regard to police protection services and facilities would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the police protection analysis above. The cumulative impacts police protection study area is the extent of the Related Projects and the service area of the Van Nuys Community Police Station.

It is anticipated that the Project in combination with the Related Projects would increase the demand for police services. This cumulative increase in demand for police services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, the Related Projects served by the LAPD would implement safety and security features according to LAPD recommendations. The LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Project and Related Projects would contribute. It is unknown whether or not any of the Related Projects would require new or expanded police stations. If there were a police protection impact due to the combined impacts of the Related Projects, the Project would not make a cumulatively considerable contribution to the impact for the reasons described above. ***Therefore, the cumulative impact would be less than significant***.

c. Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The Project is in an area that is currently served by the Los Angeles Unified School District (LAUSD) schools. The Project would construct up to 405 multi-family residential units. As shown in Table 5.23, *Student Generation*, the Project is expected to increase the local student population by a total of 169 students.

Table 5.23
Student Generation

Land Use	Size	Student Generation Rates[a]			Total Students
		Elementary School	Middle School	High School	
Residential	405 du	92	25	52	169
				Project Total	**169**

Notes: du = dwelling units; emp = employees
[a] *Based on the following generation rates: Grades TK-6: 0.2269 students per household; Grades 7-8: 0.0611 students per household; Grades 9-12: 0.1296 students per household. Source: Los Angeles Unified School District, Developer Fee Justification Study, March 2020.*
Source (table): EcoTierra Consulting, 2022.

As shown in Table 5.24, *LAUSD School Capacity and Enrollment*, all schools are currently operating over capacity.

Table 5.24
LAUSD School Capacity and Enrollment

School Name	Capacity	2020-2021 Resident Enrollment	Under/ Over Capacity	Future Enrollment[a]	Under/ Over Capacity
Columbus Avenue Elementary School (TK-5 grades) 6700 Columbus Avenue	454	479	(25)	387	67
Van Nuys Middle School (6-8 grades) 5435 Vesper Avenue	1,108	1,366	(258)	1,211	(103)
Van Nuys Senior High (9-12 grades) 6535 Cedros Avenue	2,264	3,725	(1,461)	3,710	(1,446)

a Projected 5-year total number of students living in the school's attendance area and who are eligible to be served by school programs as of the start of the school year.
Source: Written correspondence with Vincent Maffe, Director, School Management Services and Demographics, LAUSD, October 5, 2022. Refer to Appendix K to this SCEA.

Although it is very likely that some of the students generated by the Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that the 169 students generated by the Project would be new to the school district.

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

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]). Accordingly, project applicant(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

Pursuant to State law, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project's indirect impacts on any schools.

The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Thus, impacts would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the school analysis above. The cumulative impacts school study area is the extent of the Related Projects and the attendance boundaries of the LAUSD schools that serve the Project Site (i.e., Van Nuys Senior High, Van Nuys Middle School, and Columbus Avenue Elementary).

As discussed above, payment of developer impact fees in accordance with Senate Bill 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the Related Projects would be required to pay school fees to the LAUSD. The payment of school fees would

fully mitigate any potential impacts to school facilities. ***Therefore, the cumulative impact would be less than significant.***

d. Parks?

Less Than Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. The following LADRP facilities are classified as neighborhood parks and are located within a two-mile radius of the Project Site:

- Greenwood Square Park, located at 14101 West Sherman Way
- Hartland Mini-Park, located at 6830 North Woodman Avenue
- Marson Park, located at 15262 West Marson Street

The following LADRP facilities are classified as community parks and are located within a five-mile radius of the Project Site:

- Andres and Maria Cardenas Recreation Center, located at 14740 West Blythe Street
- Branford Park, located at 13310 West Branford Street
- Cleveland High School Pool, located at 8120 North Vanalden Avenue
- Delano Park, 15100 West Erwin Street
- Encino Park, located at 16953 West Ventura Boulevard
- Fernangeles Recreation Center, located at 8851 North Laurel Canyon Boulevard
- North Hills Community Park, located at 8756 North Parthenia Place
- North Hollywood Park, located at 11430 West Chandler Boulevard
- Panorama City Recreation Center, located at 8600 North Hazeltine Avenue
- Porter Ranch Park, located at 11000 North Tampa Avenue
- Reseda Park, located at 18411 West Victory Boulevard
- Sepulveda Recreation Center, located at 8825 North Kester Avenue
- Sheldon-Arleta Park, located at 12455 Wicks Drive
- Strathern Park, North, located at 8041 North Whitsett Avenue
- Studio City Recreation Center, located at 12505 West Moorpark Street
- Tarzana Recreation Center, located at 5655 North Vanalden Avenue
- Tiara Street Park, located at 11480 West Tiara Street
- Valley Plaza Park, located at 12240 West Archwood Street
- Van Nuys – Shermon Oaks, located at 14201 West Huston Street
- Van Nuys Multipurpose Center, located at 6514 North Sylmar Avenue
- Van Nuys Recreation Center, located at 14301 West Vanowen Avenue

The following LADRP facilities are classified as regional parks and are located within a ten-mile radius of the Project Site:

- Aliso Canyon Park, located at 18041 West Rinaldi Street
- Andres Pico Adobe, located at 10940 North Sepulveda Boulevard
- Beverly Glen Park, located at 2448 North Angelo Drive
- Browns Creek Park, located at 11700 North Browns Canyon Road
- Campo De Cahuenga, located at 3919 North Lankershim Boulevard
- Caplow Property, located at 20856 West Mulholland Drive
- Chatsworth Reservoir Site, located at 8751-9461 North Valley Circle Boulevard
- Coldwater Canyon Park, located at 12601 North Mulholland Drive
- Corbin Canyon Park, located at 4720 North Corbin Avenue
- Deervale – Stone Canyon Park, located at 14890 West Valley Vista Boulevard
- Eddleston Park, located at 11820 North Reseda Boulevard
- Griffith Park, located at 4730 North Crystal Springs Drive
- Hansen Dam Recreation Area, located at 12074 West Osborne Street
- Holmby Park, 601 Club View Drive
- Laurel Canyon Mulholland Park, located at 8100 West Mulholland Drive
- Limekiln Canyon Park, located at 19585 West Rinaldi Street
- Mandeville Canyon Park, located at 2660 North Westridge Road
- Moonshine Canyon Park, located at 19900 West Sesnon Boulevard
- Oakridge Residence, located at 18700 West Devonshire Street
- Old Mission Trail, located at Between Oso Canyon and Limekiln Canyon Roads
- O'Melveny Park, located at 17300 North Sesnon Boulevard
- Orcutt Ranch Horticultural Center, located at 23600 West Roscoe Boulevard
- Palisades Park (Porter Ranch), located at 12100 North Tampa Avenue
- Pilson Property, located at 19900 West Mulholland Drive
- Rivas Canyon Park, located at Easterly Terminus of Oracle Place
- Runyon Canyon Park, located at 2000 North Fuller Avenue
- Rustic Canyon Park, located at SW of Sullivan Fire Road
- San Vicente Mountain Park, located at 17500 West Mulholland Drive
- Santa Ynez Canyon Park, located at 1100 North Palisades Drive
- Sepulveda Basin Recreation Area, located at 17017 West Burbank Boulevard
- Steers Property, located at South of Owen Brown Road
- Stoney Point Park, located at 10870 North Topanga Canyon Boulevard
- Sullivan Canyon Park, NE of Sullivan Fire Road
- Verdugo Mountain Park, located at 9999 South Edmore Place
- Villa Cabrini Park, located at 9401 West Cabrini Drive
- Wattles Garden Park, located at 1824 North Curson Avenue[123]

Operation of the Project could result in an on-site population of up to approximately 984 residents.[124] Overall, the facilities in this area with active recreational features are very heavily utilized and overburdened.[125] Based on the standard minimum parkland-to-population ratio

[123] Written correspondence with Cathie Santo Domingo, Assistant General Manager, LADRP, October 11, 2022. Refer to Appendix K to this SCEA.

[124] Refer to Section XIV. Population and Housing, of this SCEA.

[125] Written correspondence with Cathie Santo Domingo, Assistant General Manager, LADRP, October 11, 2022. Refer to Appendix K to this SCEA.

provided in the City's General Plan Framework Element (i.e., 2 acres per 1,000 residents), the Project would generate a need for approximately 1.97 acre of public parkland (neighborhood and community parks). Based on LADRP's long-range minimum parkland-to-population ratio provided in the Public Recreation Plan (i.e., 4 acres per 1,000 residents),[126] the Project would generate a need for approximately 3.94 acre of public parkland. Specifically in the Van Nuys-North Sherman Oaks Community Plan Area, the Project's increase in on-site population would increase the demand on park and recreational facilities within an underserved area.

Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide recreational amenities and open space for Project residents. The Project would incorporate approximately 32,866 square feet of open space and recreational amenities, including approximately 18,496 square feet of exterior common open space and approximately 6,820 square feet of interior common open space. Additionally, the Project would include approximately 7,550 square feet of private open space in the form of balconies. Specifically, the Project's first floor would include 2,464 square feet of gym area, a 1,909 square foot lounge area, a 765 square foot recreational room, and 1,682 square feet of coworking/amenity space. The first floor would also include a 9,924 square foot pool deck area. The fourth floor would include an 1,815 square foot deck located on the central northern boundary of the Project Site. The sixth floor includes two separate roof terraces on the west and east ends of the Project, 733 square feet and 736 square feet, respectively. The roof would include a 5,288 square foot deck that would be landscaped and include seating areas. These recreational amenities would help relieve stress on the City's existing park system. Even so, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact would be reduced to a less than significant level through implementation of regulatory compliance measures that require the payment of Quimby fees and the Dwelling Unit Construction Tax to the City for the construction of apartment units. Quimby fees are assessed for the purpose of funding localized open space and recreational amenities. Monies collected as part of the Dwelling Unit Construction Tax is placed in a "Park and Recreational Sites and Facilities Fund" and used exclusively for the acquisition and development of park and recreational sites and facilities as set forth in LAMC Section 21.10.3(d).

Based on the above, with implementation of regulatory compliance measures, including payment of in lieu fees under LAMC 12.33, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts, and the Project's potential impacts on parks would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the parks analysis above.

[126] City of Los Angeles General Plan, Public Recreation Plan.

The cumulative impacts parks study area is a two-mile radius from the Project Site, which includes the three parks listed above.

As discussed above, the Project would result in a less-than-significant impact on parks and recreational facilities. The Related Projects that involve the development of residences would be required to pay a Dwelling Unit Tax. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. ***Therefore, the cumulative impact would be less than significant***.

e. Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available.

Los Angeles Public Library (LAPL) provides library services to the City. Table 5.25*, Libraries Serving the Project Site*, lists the libraries that were identified by LAPL as available to serve the Project.

Table 5.25
Libraries Serving the Project Site

	Van Nuys Branch Library
Address	6250 Sylmar Ave.
Distance to Project Site	1.8 miles
Facility Size	12,814 sf
Collection Size and Circulation	35,466 volumes 1,055 circulation
Current Service Population	113,094
Full-time Staff	9
Adequate to Meet Demand?	No

Source: Letter correspondence with Los Angeles Public Library Facilities & Event Management Division, April 4, 2023. Refer to Appendix K to this SCEA.

According to LAPL, the Van Nuys Branch Library that would serve the Project is not adequately meeting current demand for library facilities, and there are no planned improvements to add capacity through expansion or develop new libraries in the Project area.[127] Although the increase of on-site population of up to approximately 984 residents[128] that would occur with the development of the Project could increase demand for library materials, the increase in residential population would not result in a demand for new or expanded library facilities. The demand for library materials could be accommodated by the over six million books, audiobooks, periodicals, DVDs, and CDs throughout the LAPL system. The LAPL also offers many other services, including but not limited to, visual collections, e-media, web resources, research guides, and government document locator.

[127] Letter correspondence with Los Angeles Public Library Facilities & Event Management Division, April 4, 2023. Refer to Appendix K to this SCEA.

[128] Refer to Section XIV. Population and Housing, of this SCEA.

On February 8, 2007, the Board of Library Commissioners approved a Branch Facilities Plan. This Plan includes Criteria for New Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population and 14,500 square feet for community with more than 45,000 populations and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.[129] While the updated Branch Facilities Plan provides general guidance on library facility improvements, no new development or renovation of library facilities is currently planned.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[130]

Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials.

Therefore, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the libraries analysis above. The cumulative impacts libraries study area is the extent of the Related Projects and the service area of the libraries that serve the Project Site (i.e., Van Nuys Branch Library).

The Related Projects that involve the development of residences could increase the demand upon library services. However, library funding is mandated under the City Charter to be funded from property taxes, including those assessed against the Project, which would increase with the new development. The Project as well as the Related Projects would be required to pay these fees as applicable. It is unknown whether or not any of the Related Projects would require new or expanded libraries. If there were an impact on libraries due to the combined impacts of the Related Projects, the Project would not make a cumulatively considerable contribution to the impact for

[129] Letter correspondence with Los Angeles Public Library Facilities & Event Management Division, April 4, 2023. Refer to Appendix K to this SCEA.

[130] Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf. Accessed: October 2022.

the reasons described above. ***Therefore, the cumulative impact would be less than significant.***

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM REC-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.

b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:

i. Increasing the accessibility to natural areas for outdoor recreation

ii. Utilizing “green” development techniques

iii. Promoting water-efficient land use and development

iv. Encouraging multiple uses, such as the joint use of schools

v. Including trail systems and trail segments in General Plan recreation standards.

Applicability to the Project

Consistent with the measures outlined in PMM REC-1, the Project would comply with all regulatory compliance measures (payment of in-lieu fees) associated with maintaining parks and recreational facilities. The Project would also provide on-site open space as required by City standards. Thus, adherence to regulatory requirements would be equivalent to and as effective than PMM REC-1, and PMM REC-1 would not be applicable to the Project.

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would exceed the capacity of existing parks and causes premature deterioration of the park facilities.

As discussed under threshold question Public Services 14.(d), above, the Project would increase demand for parks and recreational facilities in the Project area, and the Van Nuys-North Sherman Oaks Community Plan Area is currently not meeting the standard minimum parkland-to-population ratio provided in the City’s General Plan Framework Element (i.e., 2 acres per 1,000 residents) or in LADRP’s long-range minimum parkland-to-population ratio provided in the Public Recreation Plan (i.e., 4 acres per 1,000 residents). However, the Project would provide open space and on-site recreational facilities in accordance with City standards. Further the potential impacts on parks would be reduced to a less than significant level through the implementation of regulatory compliance measures including the payment of Quimby fees and the Dwelling Unit Construction Tax to the City for the construction of apartment units. Quimby fees are assessed to raise funds for localized open space and recreational facilities. Monies collected as part of the Dwelling Unit Construction Tax is placed in a “Park and Recreational Sites and Facilities Fund” and used exclusively for the acquisition and development of park and recreational sites and facilities as set forth in LAMC Section 21.10.3(d). ***Thus, based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant.***

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. For the purpose of this issue, a significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factor:

- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Project provides 32,813 square feet of open space, including both indoor and landscaped outdoor areas. The open space is inclusive of common open space areas as well as private (balcony) open space areas. The common open space areas include terraces, gyms, recreation and community rooms, a second level courtyard with a pool adjacent community room, and a roof deck with seating and barbeque areas. These recreational amenities would be internal to the Project and would help relieve stress on the City's existing park and recreational system. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact. ***Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment and impacts would be less than significant***.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 Related Projects (see Section 3. Project Description) with respect to the recreational facilities analysis above. The cumulative impacts recreational facilities study area is a two-mile radius from the Project Site, which includes the three parks listed above.

The Related Projects that involve the development of residences would potentially result in an increase in residents in the area. In the absence of the Related Projects incorporating project-specific mitigation, cumulative development would potentially contribute to lowering the City's existing parkland-to-population ratio. The Related Projects that involve the development of residences would be required to pay a Dwelling Unit Tax. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. ***Therefore, the cumulative impact would be less than significant***.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
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?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

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

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:

  – include TDM mitigation requirements for new developments;

- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- incorporate TDM performance measures in the decision-making process for identifying transportation investments
- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- set aside funding for TDM initiatives.
- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

Applicability to the Project

Consistent with PMM TRA-1, the Project would incorporate TDM strategies, as outlined in TR-PDF-1. These TDM strategies, which include the provision of bicycle parking and reduced parking, consist of Project-specific measures which would ensure that impacts would be reduced to less than significant levels. Implementation of Project-specific Mitigation Measures would be equivalent to and more effective than PMM TR-1, and PMM TR-1 is not applicable to the Project.

PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:

   – Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.

   – Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.

   – Scheduling of truck trips outside of peak morning and evening commute hours.

   – Limiting of lane closures during peak hours to the extent possible.

   – Usage of haul routes minimizing truck traffic on local roadways to the extent possible.

   – Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.

   – Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.

   – Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.

   – Storage of construction materials only in designated areas.

- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

Applicability to the Project

The Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements. In addition, the Project would include a Construction Traffic Management Plan, as outlined in TR-PDF-2, which would ensure that adequate emergency access exists during construction. Regulatory compliance and implementation of Project-specific design features would be equivalent to and more effective than the PMM TR-2, and PMM TR-2 would not be applicable to the Project.

Impact Analysis

The following analysis is primarily based on the Transportation Assessment for the Residential Project Located at 6728 Sepulveda Boulevard in the City of Los Angeles (Transportation Assessment) prepared by Overland Traffic Consultants, Inc. dated October 2022. *A Memorandum of Understanding (MOU) establishing the parameters for the Traffic Study was prepared and approved by the LADOT on dated September 21, 2022. Refer to Appendix D of this SCEA.*

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018, and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the LADOT TAG which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The City has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects shall be evaluated for conformance with these City adopted transportation plans, programs, and policies. Per the TAG, a project would not be shown to result

in an impact merely based on whether a project would not implement a program, policy, or plan. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted programs, plans, and policies. Table 2.1-1 of the TAG identifies the key City plans, policies, programs, and ordinances relevant in determining project consistency with the transportation planning framework. Projects that generally conform with and do not obstruct the City's development plans and policies addressing the circulation system would be considered consistent. The Project's consistency with these plans, policies, programs, and ordinances is summarized in Table 5.26, *Consistency Check with Key City Plans, Programs, Ordinances, or Policies.*

Table 5.26
Consistency Check with Key City Plans, Programs, Ordinances, or Policies

Plan or Policy[131]	Consistent?	Notes	Preclude City Implementation?
LA Mobility Plan 2035	Yes	The Project would comply with the LA Mobility Plan 2035 street standards as required by the City of Los Angeles Bureau of Engineering Department.	No
Plan for a Healthy LA	Yes	The Project would support Policy 5.7, Land Use Planning for Public Health, and Greenhouse Gas (GHG) Emission Reduction by reducing single-occupant vehicle trips by its proximity to high quality and high frequency transit service. The Project would include both electric charging stations and pre-wiring spaces for potential future electric vehicle charging (Ord. 186485). The Project provides pedestrian access separate from the vehicular access. The Project would not conflict with policies in the Plan for Healthy LA.	No
Land Use Element of the General Plan (35 Community Plans)	Yes	The Project is in the Van Nuys – North Sherman Oaks Community Plan area which is currently going through a Plan update. The Project would be in substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.	No
Specific Plans	Yes	The Project is not within a Specific Plan area.	N/A
LAMC Section 12.21 A.16 (Bicycle Parking)	Yes	The Project complies with the ratio of short and long-term bicycle parking pursuant to LAMC Section 12.21. A.16.	No
LAMC Section 12.26 J (TDM Ordinance)	Yes	LAMC Section 12.26J for Transportation Demand Management and Trip Reduction Measures applies only to the construction of new non-residential floor area greater than 25,000 s.f. The Project would comply with the existing and future TDM Ordinances, as required.	No

[131] TAG Table 2.1-1, City Documents that establish regulatory framework.

Table 5.26
Consistency Check with Key City Plans, Programs, Ordinances, or Policies

Plan or Policy[131]	Consistent?	Notes	Preclude City Implementation?
LAMC Section 12.37 (Waivers of Dedication and Improvement)	Yes	No waivers for street dedications or improvements are being requested. The Project would comply with the Mobility Street Standards to serve long-term mobility needs identified in the Mobility Plan 2035.	No
Vision Zero Action Plan	Yes	Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all. One Vision Zero Project has been identified in the vicinity of the Project Site - on Vanowen Street between Sepulveda Boulevard and Van Nuys Boulevard.	No
Vision Zero Corridor Plan	Yes	LADOT is installing safety improvements on one mile of Vanowen Street, between Sepulveda Boulevard and Van Nuys Boulevard, as shown on the Los Angeles safety improvement maps. https://ladotlivablestreets.org/projects/vanowen-sepulveda-vannuys. The Project would not preclude or conflict with the implementation of this or any future Vision Zero projects in the public right-of-way.	No
Citywide Design Guidelines			
Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.	Yes	The Project would create a continuous and straight sidewalk clear of obstructions for pedestrian travel. The Project would provide adequate sidewalk width and right-of-way that accommodates pedestrian flow and activity. Pedestrian access would be at street level with direct access to the surrounding neighborhood and amenities.	No
Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.	Yes	The Project complies with the Citywide Design Guidelines incorporating vehicle access locations that do not discourage and/or inhibit the pedestrian experience. Vehicular access is from an existing driveway on Sepulveda Boulevard.	No
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	Yes	The building design uses attractive architectural elements. The Project would not preclude or conflict with the implementation of future streetscape projects in the public right-of-way.	No
NA = not applicable			

As summarized above in Table 5.26, the Project would not conflict with key City transportation planning documents. Sepulveda Boulevard is designated a Boulevard II in the Mobility Plan 2035, which calls for an 80-foot roadway (40-foot half) on 110 feet of right-of-way (55-foot half). Sepulveda Boulevard is currently developed to a 44-foot half roadway on a 55-foot half right-of-

way adjacent to the Project site. No dedication or street widening is necessary along the east side of Sepulveda Boulevard to satisfy the Boulevard II standard. Columbus Avenue is designated a Local Street which calls for a 36-foot roadway (18-foot half) on 60 feet of right-of-way (30- foot half). Columbus Avenue is currently developed to a 20- foot half roadway on a 30- foot right-of-way adjacent to the Project Site. No dedication or street widening is necessary along the west side of Columbus Avenue to satisfy the Local Street standard.

Accordingly, the Project is not required to complete dedications and improvements to meet the City's future mobility needs. ***Therefore, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant and no mitigation measures would be required***.

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

Less than Significant Impact. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts.

LADOT's TAG establishes analysis methods and impact significance criteria to apply in the analysis of VMT effects associated with new land use projects. Specifically, Threshold T-2.1 asks whether the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts. To address this question, LADOT's TAG established potential impact criteria for residential, office, regional-serving, and other land use development projects and identified significant VMT impact thresholds for each of seven Area Planning Commission (APC) sub-areas in the City. A project's VMT is compared against its APC threshold goal for household VMT per capita and work VMT per employee to evaluate the significance of the project's VMT.

Because the Project is a residential development project, per Section 2.2.3 of the TAG, the Project would have a potentially significant impact if it would generate work VMT exceeding 15 percent below the existing average VMT for the APC in which the Project is located. The Project is in the South Valley APC sub-area, which limits daily household VMT per capita to a threshold value of 9.4 and a daily work VMT per employee to a threshold value of 11.6 (15% below the existing VMT for the South Valley APC). The Project's household VMT was calculated by the Transportation Assessment using the City's VMT Calculator Version 1.3. LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

The Project's household VMT per capita is 7.3 per the LADOT VMT calculator tool, which is below the VMT threshold 9.4 VMT per capita for the South Valley APC. The work VMT per employee is not applicable because no commercial use is proposed. As a project design feature (see TR-PDF-1, below), the Project proposes to reduce parking, provide a sufficient number of bicycle parking to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21 A.16 with 18 short-term bicycle parking spaces and 176 long-term bicycles spaces on the Level P-1. ***Thus,***

based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and VMT impacts would be less than significant.

Project Design Features

The Project would implement the following Project Design Feature:

TR-PDF-1 The following Transportation Demand Management strategies will be incorporated into the Project design:

- Reduced Parking Supply – This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC without consideration of parking reduction mechanisms permitted in the code. Permitted reductions in parking supply could utilize parking reduction mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in an Enterprise Zone or Specific Plan area. Required unadjusted LAMC parking for the Project is 624 parking spaces, the Project is providing 556 parking spaces.

- Bike Parking - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project is providing 194 bicycle parking spaces (176 long-term on Level P-1 and 18 short-term along the Sepulveda Boulevard frontage).

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

Less Than Significant Impact. A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions.

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a Project Site. A review of the Project Site plans was conducted to identify any hazardous geometric design features.

The Project would use an existing driveway on Sepulveda Boulevard along the southerly property line to access the Project parking garage. As shown in the driveway analysis presented in the Transportation Assessment (Refer to Appendix D of this SCEA), no significant vehicle queuing would occur on Sepulveda Boulevard. Furthermore, the Project's local street access is consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design. With respect to pedestrian safety during construction, the Project

shall include a Construction Traffic Management Plan, as outlined in TR-PDF-2, to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This would include adequate and safe pedestrian protection, such as physical separation from work areas and vehicular traffic, and overhead protection. Temporary pedestrian facilities would be adjacent to the Project Site and provide safe, accessible routes. Covered walkways would be provided where pedestrians are exposed to potential injury from falling objects to ensure the safety of pedestrians and other vehicles in general during construction. ***Accordingly, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.***

d. Result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

Construction

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. The temporary closures would not be expected to substantially interfere with emergency response or evacuation plans.

To ensure limited interruptions due to construction activities, the Project includes project design feature TR-PDF-2 to ensure adequate circulation and emergency access through implementation of a CTM Plan that would be approved by LADOT. The CTM Plan would minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the LADOT-approved CTM Plan. Therefore, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way.

Operation

There are no hazardous design features included in the proposed vehicular design or site plan for the Project that could impede emergency access. The Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Sepulveda Boulevard. Furthermore, the Project would be subject to the plan review requirements of the LAFD pursuant to Section 118 of the Fire Code to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. All

Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project.

Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts would be less than significant.

Project Design Features

The Project would implement the following Project Design Feature:

TR-PDF-2 Pursuant to City of Los Angeles requirements, prior to the start of construction, a Construction Traffic Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by LADOT, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Temporary traffic controls during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons);
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project Site;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Coordinate with LADOT Parking Meter Division to address loss of metered parking spaces, as applicable;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate, including along all identified Los Angeles Unified School District (LAUSD) pedestrian routes to nearby schools;

- Schedule construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours, to the extent feasible, so as to not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools;

- Notify the LAUSD Transportation Branch and the site administrators of nearby LAUSD schools of the expected start and ending dates of construction. In addition, the contractor or their designee shall coordinate with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects related to existing pedestrian and school bus routes, and school drop off/pick up areas on proximate LAUSD facilities; and

- Identification of a construction manager and provision of a telephone number posted at the site during site preparation, grading, and construction readily visible to any interested party for any inquiries or complaints regarding construction activities.

Cumulative Impacts

Conflict with Program Plans

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the Related Projects add high-density development in an area with high-quality transit options and high levels of pedestrian activity. Therefore, the Project, together with the Related Projects identified in Table 5.30, would neither create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Therefore, Project operation-related and cumulative-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. ***Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and Project transportation policy impacts would be less than significant.***

VMT Analysis

A development project would have a cumulative VMT impact if it were deemed inconsistent with 2020-2045 RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact would be in alignment with the RTP/SCS and therefore, would not result in a cumulative VMT impact. ***Therefore, the Project would not make a cumulatively considerable contribution to***

***any potential cumulative impacts, and the Project would not result in a significant cumulative VMT impact*.**

Hazards Due to Geometric Design

The TAG indicates that cumulative impacts for this threshold requires a review of Related Projects with access points proposed along the same block(s) as the Project in order to determine the combined impact and the Project's contribution. None of the Related Projects identified in the Traffic Impact Assessment, and provided in Table 5.30, provide access along the same block as the Project. Thus, Related Projects and the Project would not increase hazards due to geometric design features. ***Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative geometric design impact*.**

Emergency Access

Vehicular access to the Project Site would be provided via a two-way entry/ exit driveway on North Seward Street. The Project would also include an at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations. The existing four-foot easement on the west side of the Project Site would be expanded to provide a five-foot setback that would provide one of the project's required exits to West Melrose Avenue. None of the Related Project sites are located within 500 feet of the Project Site and each has access to streets other than North Seward Street. Thus, the Project and Related Projects would not generate vehicle trips that would threaten the ability of emergency vehicles to access land uses in the project area. ***Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative emergency access impact*.**

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;

b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;

c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.

Applicability to the Project

Consistent with PMM-TCR-1, the Project would implement a standard City mitigation measure, TCR-MM-1, designed to avoid impacts to trial cultural resources. Implementation of this Project-specific Mitigation Measure would be equivalent to and more effective than the PMM TR-1, and PMM TR-1 is not applicable to the Project.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact With Mitigation Incorporated. Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCR) and establishes a formal notification and, if requested, consultation process for California Native American Tribes. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. However, consultation with California Native American tribes pursuant to AB 52 is not required for projects that qualify for the preparation of a SCEA.[132]

Regardless, a CHRIS records search was conducted through the SCCIC located at the California State University, Fullerton. The results of the record search indicate that a total of six cultural resource studies have been conducted within a 0.5-mile radius of the Project Site, none of which were within the boundaries of the Project Site.[133]

[132] Under Public Resources Code Section 21080.3.1, consultation with California Native American tribes must be initiated by the Lead Agency and concluded prior to the release of a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report for a project. As the Project does not require this level of environmental review, notification and government-to-government consultation pursuant to AB 52 and its implementing regulations are not required.

[133] Correspondence from Stacy St. James, South Central Coastal Information Center, December 1, 2022. Refer to Appendix E to this SCEA.

A Sacred Land File (SLF) search was conducted through the Native American Heritage Commission (NAHC).[134] The contents of the SLF are strictly confidential and SLF search requests return positive or negative results in addition to a list of tribal contacts with affiliation to the specified location. In a letter dated November 3, 2022, the NAHC's SLF search results indicated negative results.[135] Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA.

***With incorporation of Mitigation Measure TCR-MM-1 to address the potential for the accidental discovery of a tribal cultural resource, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. Thus, impacts would be less than significant with mitigation*.**

Mitigation Measures

In order to further address the potential for the accidental discovery of a tribal cultural resource during construction of the Project, and ensure that any potential impacts to a tribal cultural resource are avoided or reduced to less than significant levels, the City of Los Angeles's standard mitigation measure for the treatment of tribal cultural resources will be implemented, as follows:

TCR-MM-1 In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City

[134] Correspondence from Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, November 3, 2022. Refer to Appendix M of this SCEA.

[135] Correspondence from Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, November 3, 2022 (refer to Appendix M of this SCEA).

regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

Cumulative Impacts

If applicable Related Projects would comply with AB 52 in which the lead agency for each project would be required to notice tribes that are traditionally and culturally affiliated with the geographic area of the related project sites if the tribe has submitted a written request to be notified. Due to being locally specific, each related project would need to conduct a Sacred Lands File search and be evaluated within its own site specific context. The Project would not adversely affect known TCRs. ***Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resources would be less than significant***.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:

a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.

b) Inclusion of a waste management plan that promotes maximum C&D diversion.

c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).

d) Reuse of existing structure and shell in renovation projects.

e) Development of indoor recycling program and space.

f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill

siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.

g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.

h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.

i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.

j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.

k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.

l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.

m) Provide education and publicity about reducing waste and available recycling services.

n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

Applicability to the Project

Consistent with PMM USSW-2, the Project would comply with existing regulatory requirements, including adherence to applicable regulations of Title 24 of the California Building Code such as including, re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Additionally, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific impacts related to solid waste are anticipated. Since the Project would not have the potential to generate solid waste in excess of State or local standards and incorporates regulatory compliance measures that are consistent with applicable solid waste reduction measures under PMM USSW-2, PMM USSW-2 is not applicable to the Project.

PMM USWW-1: In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

Applicability to the Project

Consistent with the above measure, and as discussed in the impact analysis below, the Project would ensure that there is sufficient wastewater infrastructure capacity to serve the Project. As no Project-specific impact would occur, PMM-USWW-1 is not applicable to the Project.

PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure

sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.

b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.

c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.

d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater on-site to tertiary standards and use it for non-potable uses on-site.

Applicability to the Project

As described in the impact analysis below, available water resources are available to serve the Project, and no impacts regarding water supply are anticipated to occur. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code, which include measures that are consistent with PMM USWS-1. As the applicable regulatory requirements are equal to or more effective that PMM USWS-1, it is not applicable to the Project.

Impact Analysis

The following analysis is partially based on the Utility Report for 6728 Sepulveda Apartments prepared by Labib Funk + Associates dated August 29, 2022, which is included in Appendix L of this SCEA.

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,340 miles of pipes, and more than 115 storage tanks and reservoirs.[136] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP currently treats approximately 278 million gallons per day and has the capacity to treat 600 million gallons of water per day.[137]

LADWP maintains water infrastructure to the Project Site, which is currently an empty vacant lot. Based on available record data provided by the City, there is an 8-inch water main in Sepulveda Boulevard and 6-inch water main in Columbus Avenue.[138] The Utility Report indicated that with the implementation of a 4-inch domestic service connection and two (2) irrigation service connection infrastructure would be sufficient to serve the Project Site.[139]

As detailed below in response to Section XIX(b), sufficient water supplies would be available to serve the Project. Additionally, as discussed in response to Section XV(a), no new hydrants are anticipated. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent

[136] Los Angeles Department of Water and Power, 2020-2021 Briefing Book.

[137] Correspondence from Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water & Power, November 16, 2022. Refer to Appendix K to this SCEA.

[138] Correspondence from Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water & Power, November 16, 2022. Refer to Appendix K to this SCEA.

[139] Utility Report for 6728 Sepulveda Apartments, Appendix A, prepared by Labib Funk + Associates, August 29, 2022, Appendix L to this SCEA.

environmental analysis.[140] The Project would require construction of new, on-site water distribution lines to serve the new development. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and including offsite connection to existing water lines. Therefore, the construction of new water facilities would not result in significant environmental effects. ***Accordingly, impacts related to the construction of new water facilities would be less than significant***.

Wastewater Facilities

As detailed below in response to Section XIX(c), the Project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities. During construction of the Project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. The Project would require construction of new on-site wastewater infrastructure to serve the new development, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor offsite work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work along the Project frontage would be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures.[141] The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. ***Accordingly, impacts related to the construction of new wastewater facilities would be less than significant***.

[140] Correspondence from Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water & Power, November 16, 2022. Refer to Appendix K to this SCEA.

[141] Correspondence from Rowena Lau, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment, October 6, 2022. Refer to Appendix K to this SCEA.

Stormwater Drainage Facilities

Refer to Section c(iii), Hydrology and Water Quality, above for a discussion of stormwater drainage facilities. As discussed there, BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the same location (discharges directly to Sepulveda Boulevard, and Columbus Avenue) and drain to the same stormwater systems. This Project would comply with LID requirements by storing the required design storm in underground cisterns for later use as onsite irrigation. This system would reduce the stormwater discharges from the Project Site and result in a lower impact to the city storm drain system compared to the Site's previous development. As such the city storm drain has sufficient capacity for the proposed development. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. ***Accordingly, impacts related to the construction of new stormwater facilities would be less than significant***.

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP. Electricity demand during construction 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. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities.

During operation, electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[142] As detailed in response to Section VI(a), the estimated electricity demand of the Project during operation would represent an insignificant percentage of the LADWP's projected annual sales.[143] Furthermore, as discussed in response to Section VI(a), the incorporation of the Title 24 energy conservation standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including electricity. As such, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

[142] Los Angeles Department of Water and Power, Rules Governing Water and Electric Service, October 2008.

[143] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

Based on the above, the construction of new on-site electric power distribution facilities would not result in significant environmental effects and the expansion of off-site electric power sources would not be required. ***Accordingly, impacts would be less than significant***.

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. However, the Project would require construction of new on-site gas distribution lines to serve the new development and connection to the existing off-site natural gas facilities. The Project would connect to existing natural gas facilities in coordination with and under the supervision of SoCalGas. Construction activities typically do not involve the consumption of natural gas. Accordingly, there would be no demand generated by construction and no new natural gas facilities would be required.

During operation, natural gas service would be provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. As detailed in response to Section VI(a), the estimated natural gas demand of the Project during operation would represent an insignificant percentage of the forecasted consumption of natural gas in SoCalGas' planning area. Furthermore, as discussed in response to Section VI(a), the incorporation of the Title 24 energy conservation standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including natural gas. As such, it is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand.

Based on the above, the construction of new on-site electric power facilities would not result in significant environmental effects and the expansion of off-site natural gas sources would not be required. ***Accordingly, impacts would be less than significant***.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is

subject to its own environmental review. ***Accordingly, Project impacts to telecommunication facilities would be less than significant***.

Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant and no mitigation would be required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft.

The LADWP's 2020 Urban Water Management Plan water demand projection for 2045 is approximately 710,500 af/y for average years, 746,000 af/y for single-dry years, and 727,400 af/y for multiple-dry years. As shown in Table 5.27, *Estimated Daily Water Consumption*, below, the Project would consume approximately 46,281 gallons per day (52.40 af/y) of water. This amount would represent approximately 0.007 percent of the water supply in 2045 in average years, single-dry years, and multiple-dry years. Furthermore, the above projections are considered to be conservative as the Bureau of Sanitation generation rates used to calculate the Project's estimated water consumption do not account for any water conservation features required by local and State policies and regulations. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2, the Project would be required to implement water saving features to reduce the amount of water used by the Project, including, high efficiency toilet and urinals and low flow faucets. All fixtures would be required to meet applicable flush volumes and flow rates. In addition, the Project would be prohibited from using single-pass cooling systems. Compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, would further reduce the above projected water demand below the sewage generation factors assumed by the City's Bureau of Sanitation.

Table 5.27
Estimated Daily Water Consumption

Land Use	Size	Consumption Rate[a] (gpd)	Total Consumption (gpd)	Total Consumption (af/y)[b]
Residential-STUDIO	94 du	75/du	7,050	8.03
Residential-1 BDRM	195 du	110/du	21,450	24.09
Residential-2 BDRM	115 du	150/du	17,250	19.35
Residential-3 BDRM	1 du	190/du	190	0.37
Gym	2,464 sf	50 gpd/1,000 sf	123	0.15
Recreation Room	765 sf	50 gpd/1,000 sf	38	0.04
Amenity/Lounge	3,591 sf	50 gpd/1,000 sf	180	0.37
Total Project Water Consumption			**46,281**	**52.4**

Notes: gpd = gallons per day; af/y = acre-feet per year; sf = square feet
a Consumption rate based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.
b Totals may be off due to rounding.
Source (table): EcoTierra Consulting, 2022.

Consideration of existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2045. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.[144] Therefore, the amount of new annual demand from the Project would be insignificant relative to available supplies through 2045, projected growth in Los Angeles, and planned water resource development by LADWP. Moreover, the addition of 405 new apartment units as a result of the Project would be consistent with Citywide growth, and thereby accounted for in the 2020 UWMP. As such, the Project's estimated water demand would be within overall LADWP projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2020 UWMP.

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Therefore, the impacts on water supply would be less than significant.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

[144] City of Los Angeles Department of Water and Power, Urban Water Management Plan 2020, May 25, 2021.

The City's Bureau of Sanitation provides sewer service to the Project area. The Project Site currently has existing sewer connections to the City's sewer system. Sewage from the Project Site is conveyed via a 15-inch line in Sepulveda Boulevard. The flow from the existing 15-inch line feeds into another 15-inch line on Sepulveda Boulevard before discharging into a 69-inch sewer line on Haynes Street, which leads to the Hyperion Water Reclamation Plant (HWRP).[145] Recent data on the HWRP website indicates that on average 275 million gallons of wastewater enters the HWRP on a dry weather day.[146] Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.[147] Accordingly, there is a residual dry weather day capacity of 175 mgd, or 39 percent of the total. There is also a peak weather flow remaining capacity of 250 mgd, 31 percent of the total.

The type and amount of wastewater that would be generated by the Project would be typical for the types of residential uses proposed for the Project Site. Estimated wastewater generation for the Project is presented below in Table 5.28, *Estimated Daily Wastewater Generation*. As shown, the Project would generate approximately 46,281 gpd (0.046 mgd) of wastewater. This amount would represent approximately 0.03 percent of the remaining daily capacity at the HTP. Therefore, the HTP has adequate capacity to serve the Project's demand in addition to its existing commitments and the Project would not require the construction of new or expanded wastewater treatment facilities. Furthermore, as with the projections of water demand detailed above, the estimated wastewater generation is a conservative estimate as the Bureau of Sanitation generation rates do not account for water conservation features that would reduce the amount of the Project's water usage and, therefore, resulting conveyance into the wastewater distribution and treatment system. ***Accordingly, impacts related to wastewater treatment capacity would be less than significant.***

[145] Correspondence from Rowena Lau, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment, October 6, 2022. Refer to Appendix K to this SCEA.

[146] City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=ub9tal2hv_5&_afrLoop=18390977646813541#!. Accessed: October 2022.

[147] City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=ub9tal2hv_5&_afrLoop=18390977646813541#!. Accessed: October 2022.

Table 5.28
Estimated Daily Wastewater Generation

Land Use	Size	Generation Rate[a] (gpd)	Total Generation (gpd)
Residential-STUDIO	94 du	75/du	7,050
Residential-1 BDRM	195 du	110/du	21,450
Residential-2 BDRM	115 du	150/du	17,250
Residential-3 BDRM	1 du	190/du	190
Gym	2,464 sf	50 gpd/1,000 sf	123
Recreation Room	765 sf	50 gpd/1,000 sf	38
Amenity/Lounge	3,591 sf	50 gpd/1,000 sf	180
Total Project Wastewater Generation			**46,281**

Notes: gpd = gallons per day; af/y = acre-feet per year; sf = square feet
a Consumption rate based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.
b Totals may be off due to rounding.
Source (table): EcoTierra Consulting, 2022.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the City is serviced by the Sunshine Canyon Landfill. The landfill accepts residential, commercial, and construction waste. Solid waste from the Project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers. the Sunshine Canyon Landfill has a remaining capacity of approximately 55.16 million tons of remaining capacity and a remaining life expectancy of approximately 18 years.[148] The landfill has a permitted maximum

[148] County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

daily intake of 12,100 tons per day (tpd)[149] and the 2019 disposal rate was approximately 6,919 tpd.[150]

Construction of the Project would generate construction and demolition waste. Construction of the Project building is estimated to generate a total of approximately 589 tons of solid waste.[151] This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As required by City Ordinance No. 181519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Management Plan 2019 Annual Report* concludes that there is current capacity of 58.84 million tons available throughout the County for the disposal of inert waste.[152] Therefore, the Project-generated construction waste of 589 tons would represent a very small percentage of the inert waste disposal capacity in the region.

During operation, the Project would generate solid waste that is typical of a residential use and would be consistent with all federal, State, and local statutes and regulations regarding proper disposal. As shown in Table 5.29, *Estimated Daily Solid Waste Generation*, the Project would generate approximately 4,953 pounds per day of solid waste. As discussed below in response to Section XIX(e), AB 939 was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. Furthermore, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939 and AB 1327. Therefore, it is assumed that the Project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills and have adequate areas for collection and removal of recyclable materials. Nonetheless, it is conservatively assumed that all 4,953 pounds per day of the Project's solid waste would be disposed of at regional landfills. The Sunshine Canyon Landfill's permitted daily intake of 12,100 tons per day would have capacity to accept the net daily operational waste generated by the Project under the existing permitted amount. Therefore, the Project would not generate solid waste in excess of state and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. ***Accordingly,***

149 California Integrated Waste Management Board, Solid Waste Information System, Facility/Site Summary Details, https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/4702. Accessed October 2022.

150 County of Los Angeles, Department of Public Works, CoIWMP 2019 Annual Report, September 2020, Appendix E-2, Table 4, Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

151 A construction waste generation rate of 4.38 pounds per square foot was used. 268,770 square feet of residential construction multiplied by 4.38 pounds is 1,177,213 pounds (589 tons). Source: USEPA Report No. EPA A530-98-010, Characterization of building Related Construction and Debris in the United States, Table 3, July 1998.

152 County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020. Page 33.

impacts related to solid waste and solid waste reduction goals would be less than significant.

Table 5.29
Estimated Daily Solid Waste Generation

Land Use	Size	Generation Rate (pounds/unit)[a]	Total Generation (pounds/day)
Residential	405 units	12.23/du	4,953
Total Project Solid Waste Generation			**4,953**

Notes: sf = square feet
[a] Generation rates are from the City of Los Angeles LA CEQA Thresholds Guide, 2006, page M.3-2.
Source (table): EcoTierra Consulting, 2022.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated onsite by the project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

Consistency with California Integrated Waste Management Act of 1989

The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's solid waste generated (4,953 pounds per day) must be recycled rather than disposed of in a landfill. The Project would be required to comply with AB 939 requirements and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would also be required to comply with the Bureau of Sanitation Solid Resources Infrastructure Facility Plan to reduce the amount of solid waste being disposed into landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Therefore, the Project would not substantially increase solid waste generation in the City or the amount disposed into the landfills. Accordingly, the Project would be consistent with AB 939.

Consistency with the City of Los Angeles General Plan Framework Element

The Framework Element of the City of Los Angeles General Plan also supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[153] The Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The Project would include enclosed trash areas and recycling storage areas and divert 50 percent of the construction waste debris away from landfills. The Project would be consistent with the City of Los Angeles General Plan

[153] Los Angeles Department of City Planning, Citywide General Plan Framework, 1996. Page 9-11.

Framework goal of maximizing source reduction and materials recovery, and minimizing the amount of waste requiring disposal. Therefore, the Project would be consistent with the Framework Element.

Consistency with City of Los Angeles Zero Waste Plan

The City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The Zero Waste Plan aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g. adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multi-family and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities new policies and programs, and the development of future recycling facilities.[154] The Project would include enclosed trash areas and recycling storage areas and would divert construction waste debris away from landfills. The Project would also be consistent with the City's Zero Waste Plan goal of minimizing the amount of waste requiring disposal through green bin recycling program. Therefore, the Project would be consistent with the City's Zero Waste Plan.

Consistency with the Los Angeles Municipal Code

The LAMC requires a project to be designed to incorporate a recycling area or room.[155] The Project would be required to comply with this requirement and have sufficient containers to accommodate the amount of solid waste and recycling generated by the premises, and landscape waste would be placed in designated green waste bins. Therefore, the Project would be consistent with the LAMC.

Therefore, based on the above, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Accordingly, impacts would be less than significant.

Cumulative Impacts

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2020 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2045. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant. Ultimately, the wastewater and water facilities (HTP and LAAFP) and Sunshine Canyon landfill have adequate capacity to accommodate the project and Related Projects along with the general

[154] Los Angeles Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013.

[155] Los Angeles Municipal Code, Section 12.21.A.19.c.

growth within the City.[156] It is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Related Projects like Project, electricity demand. It is expected that SoCalGas' existing and planned natural gas capacity and supplies would be sufficient to serve the Project's demand. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. ***Therefore, the Project's contribution to cumulative wastewater, water, solid waste, electricity, natural gas, and telecommunications impacts would not be cumulatively considerable and cumulative impacts would be less than significant***.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

[156] The Countywide Integrated Management Plan 2019 Annual Report concludes that there is current capacity of 58.84 million tons available throughout the County for the disposal of inert waste. County of Los Angeles Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020. Page 33.

SCAG 2020-2045 RTP/SCS PEIR Mitigation Measures

PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.

b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.

c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.

d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.

e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.

f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place

g) Include external sprinklers with an independent water source to reduce flammability of structures.

h) Include local solar power paired with batteries to reduce power flow in electricity lines.

i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.

j) Provide fire hazard and fire safety education for homeowners in or near

fire hazard areas.

k) Developments in fire-prone areas should have fire-resistant feature, such as:

– Ember-resistant vents

– Fire-resistant roofs

– Surrounding defensible space

– Proper maintenance and upkeep of structures and surrounding area

Applicability to the Project

As described in the impact analysis below, the Project Site is not located in an area classified as a Very High Fire Hazard Severity Zone (VHFHSZ) and is not located adjacent to a VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measures included in PMM-WF-1 are not applicable to the Project.

PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:

– Submit a fire protection plan including the designation of fire watch staff;

– Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;

– Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and

– Designate trained fire watch staff during project construction to reduce risk of fire hazards.

Applicability to the Project

As previously discussed, the Project Site is not located in an area classified as a VHFHSZ. Thus, PMM WF-2 is not applicable to the Project.

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The Project Site is not located within VHFHSZ as designated by the LAFD[157] and the California Department of Forestry and Fire Protection (CalFIRE).[158] The Project Site is located along Sepulveda Boulevard, which is not identified as a selected disaster route by the City,[159] nor as a disaster route by Los Angeles County.[160] The nearest disaster route, which may be utilized for an evacuation route during an emergency, is Victory Boulevard, located 0.5 mile south of the Project Site.[161] The Project constitutes a private development located on private land and does not propose alteration to the public rights-of-way. No full road closures along Sepulveda Boulevard or Columbus Avenue during construction are anticipated. Construction activities for the Project would primarily be confined to the Project Site. In addition, pursuant to Project Design Feature TR-PDF-2, a Construction Traffic Management Plan would be implemented to ensure that adequate emergency access is maintained in the vicinity of the Project. Furthermore, if lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Project would comply with access requirements from the LAFD and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. ***Impacts related to the implementation of the City's emergency response plan would be less than significant***.

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157 City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

158 CalFire, FHSZ Viewer, https://egis.fire.ca.gov/FHSZ/. Accessed October 2022.

159 City of Los Angeles Geo Hub, Disaster Routes, https://geohub.lacity.org/datasets/6223f108d67d49958d05092e0b488740/explore?location=34.191708%2C-118.463925%2C15.00. Accessed October 2022.

160 Los Angeles County Department of Public Works, Disaster Routes with Roads Districts Map, City of Los Angeles Valley Area, August 13, 2008.

161 City of Los Angeles Geo Hub, fire hydrant locations, https://geohub.lacity.org/datasets/fire-hydrants-dwp/explore?location=34.064408%2C-118.370576%2C19.00. Accessed October 2022.

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?

No Impact. A significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire.

The Project Site is located within a highly developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a VHFHSZ;[162] nor is the Project Site within a wildland fire hazard area.[163] Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. ***Accordingly, no impacts would occur***.

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 Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.

The Project would involve the construction of a new building in a highly urbanized area in the Van Nuys community of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. ***Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant.***

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

The Project would be required to comply with all developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for fire at the Project Site. Any installation of on-site power lines required to provide the Project with electricity and

[162] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

[163] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/. Accessed October 2022.

connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity is relatively flat with no major slopes that would be susceptible to flooding or landslide are located nearby. ***Accordingly, the Project would not expose people or structures to such hazards and impacts would be less than significant***.

Cumulative Impacts

If lane closures are necessary to local streets adjacent to Related Project sites, travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Related Projects, like the Project, would comply with access requirements from the LAFD and would not impede emergency access within the vicinity of each Related Project site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Cumulative impacts related to the implementation of the City's emergency response plan would be less than significant.

All of the Related Project Sites and the Project Site are within urbanized areas of the City and do not include wildlands or fire hazard terrain or vegetation. Therefore, the Project and Related would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. ***Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative wildfire impact would occur***.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant with Mitigation Incorporated. Based on the analyses contained under Section I through Section XX above, with adherence to regulatory compliance measures and mitigation measures, the Project would not have the potential to degrade the quality of the environment and would not result in any significant unavoidable impacts to the environment. The Project Site is located within an urbanized area and is currently vacant. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project Site. The Project Site does include ornamental trees and landscaping that could support nests for migratory birds or other habitat for urban species. Adherence to the Migratory Bird Treaty Act and the California Fish and Game Code and incorporation of RTP/SCS Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 RTP/SCS PEIR MMRP would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Thus, the Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed under Section V, Cultural Resources, Section VII, Geology and Soils, and Section XVIII, Tribal Cultural Resources, with implementation of the City's Conditions of Approval regarding the potential inadvertent discovery of archaeological or paleontological resources, and with incorporation of Mitigation Measure TCR-MM-1 regarding the accidental discovery of a tribal cultural resource, impacts to archeological resources,

paleontological resources, and tribal cultural resources would be less than significant. Thus, overall, no evidence is presented that the Project would degrade the quality of the environment.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The cumulative analysis in this SCEA takes into consideration the 21 Related Projects listed in Table 3.3, *List of Related Projects*, and shown in Figure 3.8, *Related Projects Location Map*. A significant impact may occur if the Project, in conjunction with the 21 Related Projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis. The cumulative analyses for each environmental issue area are contained under Section I through Section XX, above, following the assessments of Project impacts. **Based on these analyses, cumulative impacts related to all of the above environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable**.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. ***Thus, impacts to humans would be less than significant***.