LOS ANGELES DEPARTMENT OF CITY PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

# 6136 West Manchester Boulevard Project (Recirculated SCEA)

Case Number: ENV-2022-6065-SCEA

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**Project Location:** 6136 West Manchester Avenue and 8651 South La Tijera Boulevard, Los Angeles, California 90045

**Community Plan Area:** Westchester–Playa del Rey

**Council District:** CD 11—Park

**Project Description:** The Project includes the development of a new approximately 416,915-square-foot mixed-use building comprised of 489 residential units, including six (6) live-work units and 64 dwelling units set aside for Very Low-Income Households, and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within an eight-story building with a maximum height of 96 feet. The Project would provide 549 vehicular parking spaces that would be located within two (2) subterranean parking levels and buffered into the first and second level of the building. In addition, the Project would include approximately 51,385 square feet of open space, including 43,235 square feet of common open space and 8,150 square feet of private open space. As part of the Project, the existing commercial structures totaling 21,911 square feet of floor area would be demolished. The Project would result in a total floor area of approximately 416,915 square feet with a floor area ratio (FAR) of 4:1.

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

**PREPARED BY:**
Eyestone Environmental, LLC

**APPLICANT:**
6136 Manchester Avenue Apartments, LLC

**October 2024**

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# 1 INTRODUCTION

An application for the proposed 6136 West Manchester 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).

A SCEA was published on July 27, 2023, and was available for public review from July 27, 2023, to August 28, 2023. Subsequent to the publication of the SCEA, the Project Applicant has revised the Project. The proposed modifications to the Project include an increase in the number of residential units proposed (441 residential units to 489 residential units, including 64 units for Very Low-Income Households). The increase in residential units has also resulted in minor modifications to the total proposed vehicular parking spaces; open space and recreational amenities; bicycle parking spaces; and requested entitlements, including the elimination of the request for a Conditional Use Permit for an increase in density beyond the maximum 35 percent permitted by Los Angeles Municipal Code (LAMC) Section 12.22 A.25. All other aspects of the Project would remain unchanged. As a result of the proposed modifications to the Project, the SCEA has been revised, and is being recirculated for a new public review period. Public review requirements described in Section 1.1.2, below are applicable to this recirculated SCEA.

This SCEA evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. As part of this SCEA, an Initial Study has been prepared (refer to Section 5, Environmental Impact Analysis, of this SCEA) in accordance with CEQA (Public Resources Code [PRC] §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], §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 (CEQA) 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."

On April 4, 2024, SCAG's Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024). The 2024–2050 RTP/SCS has yet to be adopted by CARB.

SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for Transit Priority Projects (TPPs), as described below, that are consistent with the 2020–2045 RTP/SCS. As discussed above, the 2024–2050 RTP/SCS has yet to be adopted by CARB. As

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[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.*

such, an analysis of the Project's consistency with the 2024–2050 RTP/SCS is provided below for informational purposes.

### 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 incorporate 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 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. 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 Initial Study is organized into sections as follows:

#### 1 INTRODUCTION

The Introduction describes the purpose and content of the SCEA and provides an overview of the CEQA process.

#### 2 EXECUTIVE SUMMARY

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

### 3 PROJECT DESCRIPTION

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

### 4 EVALUATION OF ENVIRONMENTAL IMPACTS

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://files.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** | **6136 W. MANCHESTER PROJECT** |
| ENVIRONMENTAL CASE NO. | ENV-2022-6065-SCEA |
| RELATED CASES | CPC-2022-6064-DB-MCUP-CDO-SPR-HCA-PHP |

| | |
|---|---|
| **PROJECT LOCATION** | **6136 West Manchester Avenue and 8651 South La Tijera Boulevard, Los Angeles, California 90045** |
| COMMUNITY PLAN AREA | Westchester–Playa del Rey |
| GENERAL PLAN DESIGNATION | Community Commercial |
| ZONING | [Q]C2-1-CDO |
| COUNCIL DISTRICT | Council District 11 |

| | |
|---|---|
| **LEAD AGENCY** | **City of Los Angeles** |
| CITY DEPARTMENT | Department of City Planning |
| STAFF CONTACT | Michelle Carter |
| ADDRESS | 200 North Spring Street, Room 763<br>Los Angeles, CA 90012 |
| PHONE NUMBER | (213) 978-1262 |
| EMAIL | michelle.carter@lacity.org |

| | |
|---|---|
| **APPLICANT** | **6136 Manchester Avenue Apartments LLC** |
| ADDRESS | 1901 Avenue of the Stars, Suite 1950<br>Los Angeles, California 90067 |
| PHONE NUMBER | (310) 566-8700 |

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would be potentially affected by the Project, as indicated by the checklist on the following pages (refer to Section 5, Environmental Impact Analysis, of this SCEA).

| | | |
|---|---|---|
| ☐ 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 |
| | | ☒ None identified |

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

| Michelle Carter, City Planner | October 31, 2024 |
|---|---|
| **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 6136 W. Manchester Project (Project) includes the construction of a new mixed-use building with multi-family residential and live-work units as well as ground floor commercial uses within a 105,267-square-foot (2.42-acre) site located at 6136 Manchester Avenue and 8651 La Tijera Boulevard (Project Site), within the Westchester–Playa del Rey Community Plan[2] area of the City of Los Angeles (City). Specifically, the Project includes the development of a new approximately 416,915-square-foot mixed-use building comprised of 489 residential, including six live-work units and 64 dwelling units set aside for Very Low-Income Households, and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within a single eight-story building with a maximum height of 96 feet. The Project would provide 549 vehicular parking spaces that would be located within two (2) subterranean parking levels and buffered into the first and second levels of the new building. In addition, the Project would include approximately 51,385 square feet of open space, including 43,235 square feet of common open space and 8,150 square feet of private open space. As part of the Project, the Project Site's existing commercial structures, totaling 21,911 square feet of floor area, would be removed. Upon completion, the Project would result in a total floor area of approximately 416,915 square feet with a floor area ratio (FAR) of 4:1.

## 3.2 ENVIRONMENTAL SETTING

### 3.2.1 Project Location

The Project Site is located at 6136 West Manchester Avenue and 8651 South La Tijera Boulevard within the Westchester–Playa del Rey Community Plan area of the City. As shown in Figure 1 and Figure 2 on pages 10 and 11, the Project Site is generally bounded by Manchester Avenue to the north, La Tijera Boulevard to the south and east, and Truxton Avenue to the south and west. Regional access to the Project Site is provided by Interstate 405 (I-405), located approximately 1.2 miles north of the Project Site. Local access to the Project Site is provided by several local streets and avenues, including Manchester Avenue and La Tijera Boulevard.

### 3.2.2 Existing Conditions

The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. Vehicular access to the Project Site is provided via driveways along Manchester Avenue, La Tijera Boulevard, and Truxton Avenue. Pedestrian access to the Project Site is provided via sidewalks provided along the entire perimeter of the Project Site along Manchester Avenue, La Tijera Boulevard, and Truxton Avenue. The Project Site contains limited to sparse landscaping in the form of nonnative/non-protected trees, hedges, and shrubs.

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[2] *The Westchester–Playa del Rey Community Plan is one of the four Westside community plans currently being updated by the City of Los Angeles Department of City Planning.*

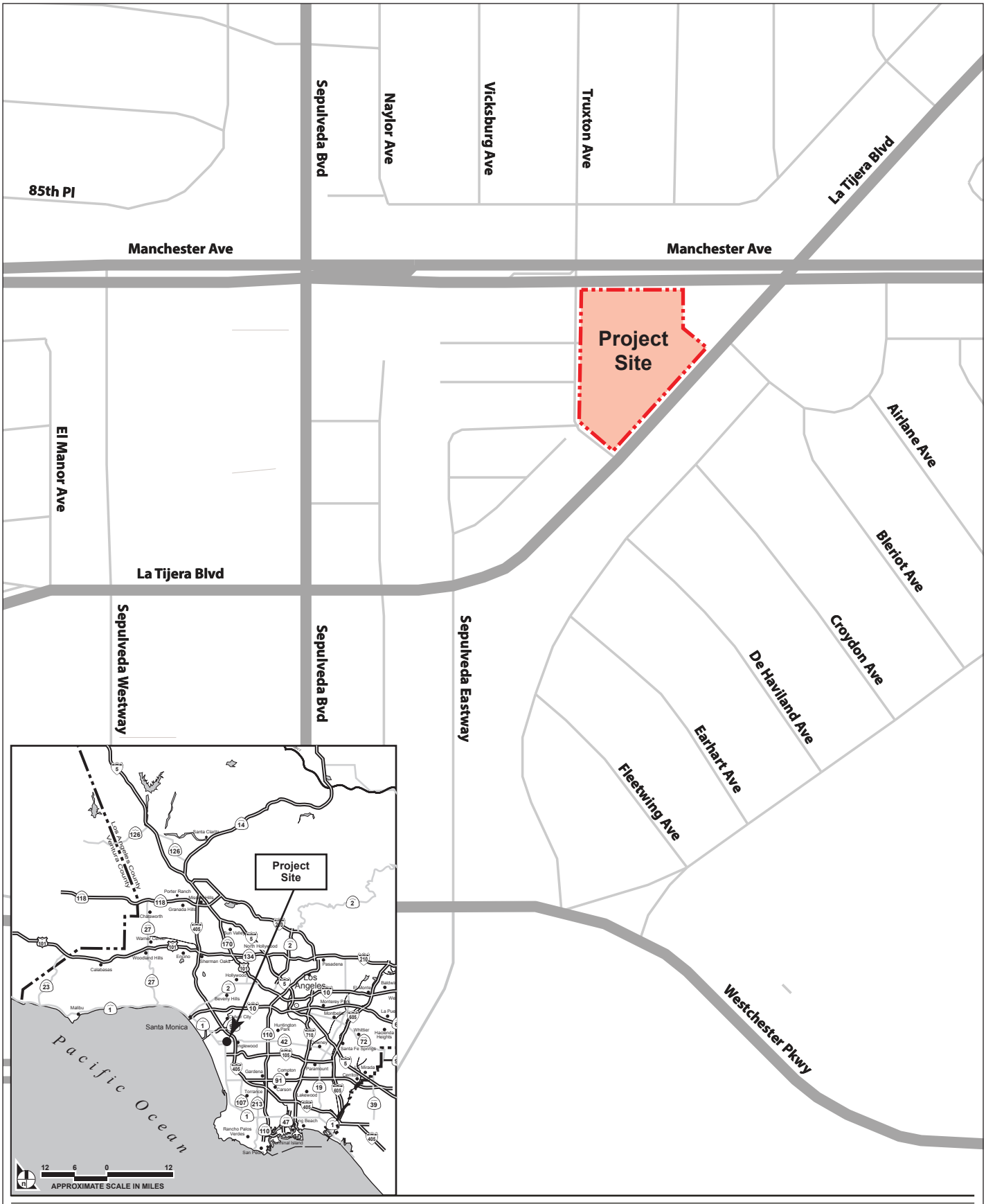


**Figure 1**
Project Location Map

Source: ArcGIS, 2024; Eyestone Environmental, 2024.

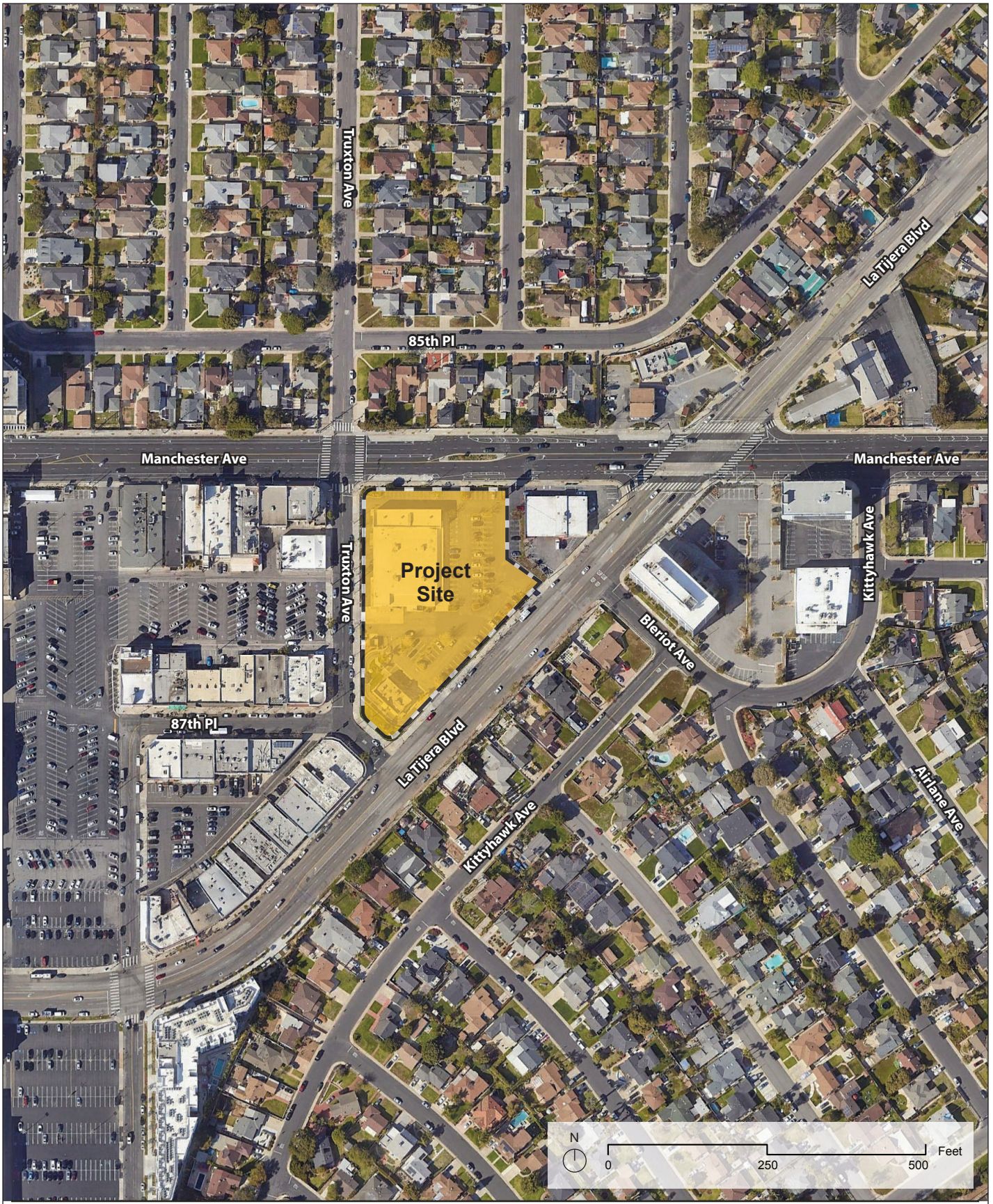


**Figure 2**

Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2024; Eyestone Environmental, 2024.

### 3.2.2 Existing Conditions

The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. Vehicular access to the Project Site is provided via driveways along Manchester Avenue, La Tijera Boulevard, and Truxton Avenue. Pedestrian access to the Project Site is provided via sidewalks provided along the entire perimeter of the Project Site along Manchester Avenue, La Tijera Boulevard, and Truxton Avenue. The Project Site contains limited to sparse landscaping in the form of nonnative/non-protected trees, hedges, and shrubs.

Specifically, there are a total of 61 trees that were inventoried within and adjacent to the Project Site. (43 on-site trees and 18 street trees). None of the 61 trees are considered to be protected by the City's Protected Tree and Shrub Ordinance (Ordinance No. 186,873)[3,4] (e.g., Taiwanese Rain Tree, Queen Palm, Pygmy Date Palm, and Liquid Amber).

The Project Site has a General Plan land use designation of Community Commercial. The Project Site is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). Pursuant to the LAMC, the C2 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds, and R4 (residential multiple dwelling) uses. The Project Site's Q condition was established in 2008 and requires compliance with the Downtown Westchester Community Design Overlay District, as discussed below. The "1" indicates that the Project Site is located in Height District 1, which in conjunction with the C2 Zone, does not impose a maximum building height but does limit the FAR to 1.5:1. The "CDO" indicates the Project Site is located within the Downtown Westchester Community Design Overlay (CDO) District, which provides design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, appearance and enjoyment of Downtown Westchester.

The Project Site is also within the boundaries of the Los Angeles Coastal Transportation Corridor Specific Plan (Specific Plan) established pursuant to Ordinance No. 168,999, effective on September 22, 1993, and amended pursuant to Ordinance Nos, 186,104 and 186,105 on June 28, 2019.[5]

The Project Site is served by a variety of public transit options provided by the Los Angeles County Metropolitan Transit Authority (Metro), the Los Angeles Department of Transportation Commuter Express (LADOT CE), Culver CityBus, and Santa Monica Big Blue Bus (BBB). Specifically, transit options in the vicinity of the Project Site include the Metro Local Bus Routes 102 and 115 along Manchester Avenue with connections from the 102 to the Metro E Rail Line (Expo Line) at Expo/Western, Expo/Vermont, and Expo Park/USC; LADOT CE Route 574; Santa Monica BBB

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[3] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

[4] *Pursuant to Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.*

[5] *City of Los Angeles, Coastal Transportation Corridor Specific Plan, effective September 22, 1993, amended June 28, 2019.*

Routes 3 and Rapid 3; and Culver CityBus Routes 6 and Rapid 6 along Sepulveda Boulevard. The Project Site is also located within the former Los Angeles State Enterprise Zone.

Additionally, per Assembly Bill (AB) 2097, the Project is not required to provide parking as it is a transit-proximate mixed-use project with residential and commercial uses. Specifically, on September 22, 2022, AB 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within 0.5 mile of a major transit stop.[6]

### 3.2.3 Surrounding Land Uses

As illustrated in Figure 2 on page 11, the Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial and residential uses. Properties to the north along West Manchester Avenue are zoned R1-1 and are developed with one- to two-story single-family residences. Immediately adjacent to the Project Site to the east is a Best Performance Tire & Service auto shop. This property is zoned [Q]C2-1-CDO. Further east, across La Tijera Boulevard, is a multi-story office building. Other properties east of the Project Site along La Tijera Boulevard are zoned [Q]C2-1-CDO and are primarily developed with one- to two-story single-family residences. Properties to the south along La Tijera Boulevard are zoned R1-1 and developed with one- to two-story single-family residences. Properties to the west along Truxton Avenue are zoned [Q]C2-1-CDO and are primarily developed with low-rise commercial structures, including a strip mall with restaurants.

## 3.3 DESCRIPTION OF PROJECT

### 3.3.1 Project Overview

As discussed above and summarized in Table 1 on page 14, the Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The 489 units consist of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units. The proposed uses would be located within a single eight-story building with a maximum height of 96 feet. The Project would provide 549 vehicular parking spaces that would be located within two (2) subterranean parking levels and buffered into the first and second levels of the new building. In addition, the Project would include approximately 51,385 square feet of open space, including 43,235 square feet of common open space and 8,150 square feet of private open space. As part of the Project, the existing commercial structures totaling 21,911 square feet would be removed.

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[6] *AB 2097 defines a major transit stop as a site containing any of the following: i) an existing rail or bus rapid transit station; ii) a ferry terminal served by either a bus or rail transit service, or ii) the intersection of two or mor major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak hours 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M. For overlapping local/express/bus rapid transit lines, SCAG and the City of Los Angeles recognize the combined routes to calculate the headway frequency ("Methodology for Determining Bus Transit Service Levels; Implementation of Rapid Bus Provisions of the Transit Oriented Communities Program", Los Angeles Department of City Planning, April 16, 2024). As detailed in Table 2 of the Transportation Assessment, included as Appendix K.1, of this SCEA, Metro Local Route 115, which travels east-west along Manchester Avenue, and Santa Monica BBB Routes 3 and Rapid 3, which travels north-south along Sepulveda Boulevard, operate with headways of 15 minutes or less during the morning and afternoon peak hours. Therefore, the intersection of Sepulveda Boulevard and Manchester Avenue qualifies as a major transit stop.*

**Table 1**
**Summary of Proposed Floor Area[a]**

| Land Use | Proposed Development |
|---|---|
| Residential—Apartments | 400,795 (489 du) |
| Commercial | |
| Restaurant | 10,747 sf |
| Retail | 5,373 sf |
| **Project Total** | **416,915 sf** |

*du = dwelling units*

*sf = square feet*

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

*Source: AC Martin, 2024.*

Upon completion, the Project would result in a total floor area of approximately 416,915 square feet with a FAR of 4:1. A conceptual site plan of the Project is included in Figure 3 on page 15.

### 3.3.2 Design and Architecture

In accordance with the spirit and intent of the Westchester–Playa Del Rey Community Plan and the Downtown Westchester CDO, the building uses a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. The Project would be stepped back along the La Tijera Boulevard frontage and would feature roof decks at alternating floors along the intersection of La Tijera Boulevard and Truxton Avenue, and a roof deck at the corner of Manchester Avenue and Truxton Avenue. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade and activate the building's elevation at the upper floor levels. The Project would provide a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and expand the existing commercial hub. Additionally, the Project would enhance the street frontages with attractive landscaping and architectural design features and include pedestrian amenities and street activating uses such as outdoor dining. Overall, the Project would be designed to create a unified site that would complement and enhance the surrounding area. Conceptual renderings of the Project are provided in Figure 4 and Figure 5 on pages 16 and 17.

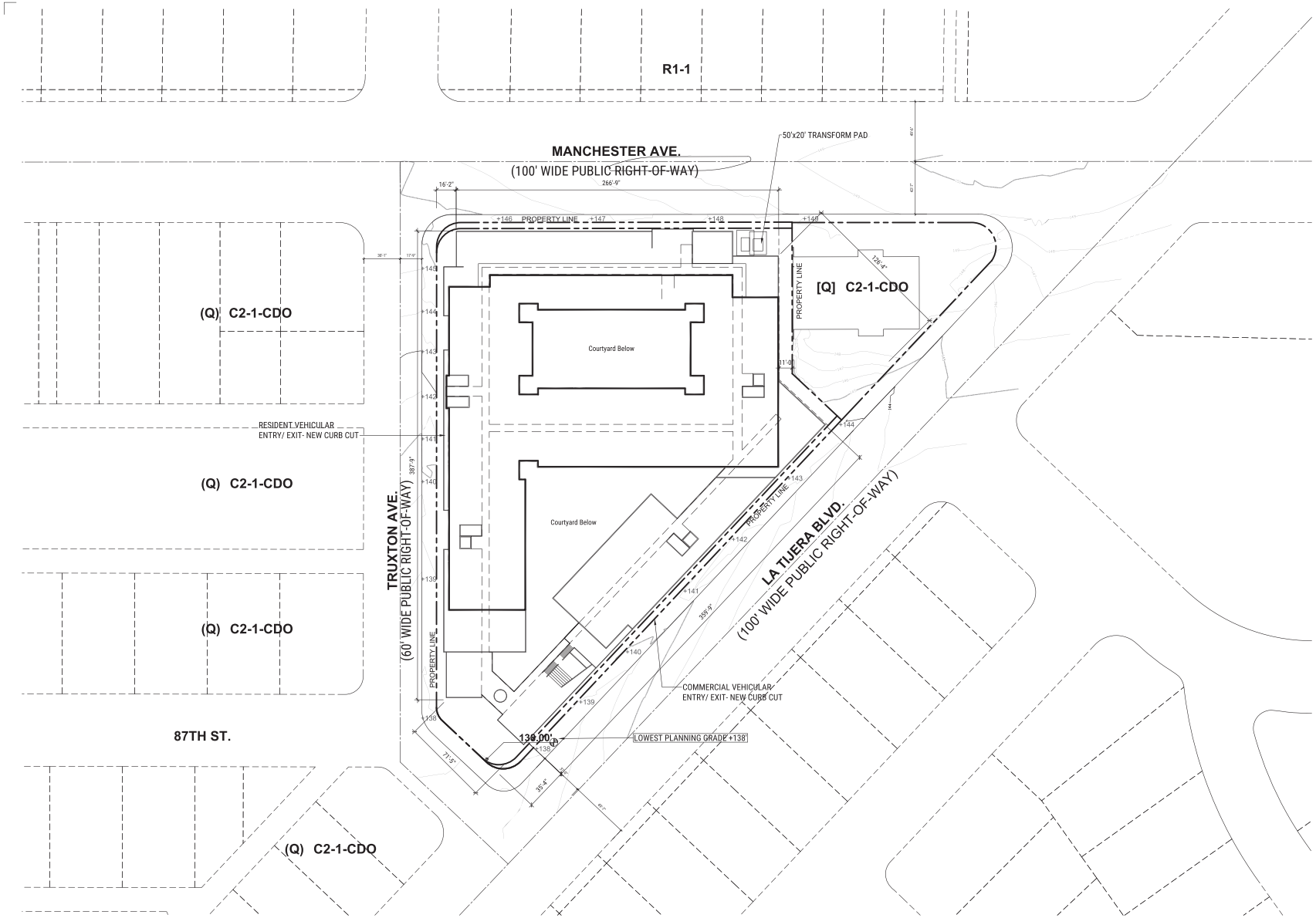


**Figure 3**
Conceptual Site Plan

Source: AC Martin Inc., 2024.



**Figure 4**
Conceptual Rendering—Manchester Avenue

Source:AC Martin Inc., 2024.




**Figure 5**
Conceptual Rendering—Manchester Avenue and Truxton Avenue

Source: AC Martin Inc., 2024.

### 3.3.3 Open Space and Landscaping

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, including approximately 43,235 square feet of common open space consisting of approximately 30,830 square feet of exterior common open space and approximately 12,405 square feet of interior common open space; and 8,150 square feet of private open space, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. The Project would also provide 14,388 square feet of landscaping throughout the Project Site.

Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Conceptual landscape plans are provided in Figure 6 through Figure 9 on pages 19 through 22.

As previously discussed, there are a total of 61 trees that were inventoried within and adjacent to the Project Site. Of these, 45 trees would be removed, including 43 on-site trees and two off-site City street trees. However, as provided in the Arboricultural Inventory and Report included in Appendix A, none of the trees are considered to be protected by the City's Protected Tree and Shrub Ordinance.[7] The Project would provide 79 new on-site trees on the ground floor and on various building levels. As this is less than the 123 on-site trees required pursuant to LAMC Section 12.21 G.2(a)(3), the Project will utilize the provisions of Ordinance No. 185,573 to pay an in-lieu fee for the provision of the remainder of the 44 trees to meet the required 123 trees. In addition, the City street trees to be removed would require approval of a street tree removal permit by the Board of Public Works and the planting of replacement street trees in accordance with current Urban Forestry Division policies.

### 3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via a two-way driveway along Truxton Avenue and a two-way driveway along La Tijera Boulevard. An access gate between the commercial and residential uses would be provided to ensure security for resident parking. Access for trash pickup and other freight vehicles would be provided via a loading dock within the parking garage.

[7] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*




**Figure 6**
Ground Level Landscape Plan

Source: MJS Landscape Architecture, 2024.




**Figure 7**
Podium Level Landscape Plan

Source: MJS Landscape Architecture, 2024.

**L8 DINNER PARTY**

- DINNER PARTY DECK
- OUTDOOR KITCHEN
- SHADE STRUCTURE
- VINES ON WIRE TRELLIS
- LOUNGE SEATING
- LUSH PLANTING TRAYS
- TREE GROVE

**L5 SOCIAL**

- SHADE STRUCTURE
- OUTDOOR KITCHEN
- VIEWS TO LAX/PLANE SPOTTING
- LUSH PLANTING TRAYS
- LOUNGE SEATING
- HANGING CHAIRS



**L6 VIEW TERRACE**

- CLUB ROOM W/ LOUNGE FURNISHINGS AND TV
- SHADE TRELLIS WITH ICONIC TRELLIS AND PENDENT LIGHTING
- SIT UP BAR SEATING
- LUSH PLANTING TRAYS

**L5 SKY LOUNGE**

- LOUNGE SEATING
- PING PONG
- GRAND STAIRCASE TO LEVEL 6 WITH SUNNING DECK
- LUSH PLANTING TRAYS
- POTTERY W/ ACCENT TREES



**Figure 8**

Rooftop Landscape Plan (South)

Source: MJS Landscape Architecture, 2024.

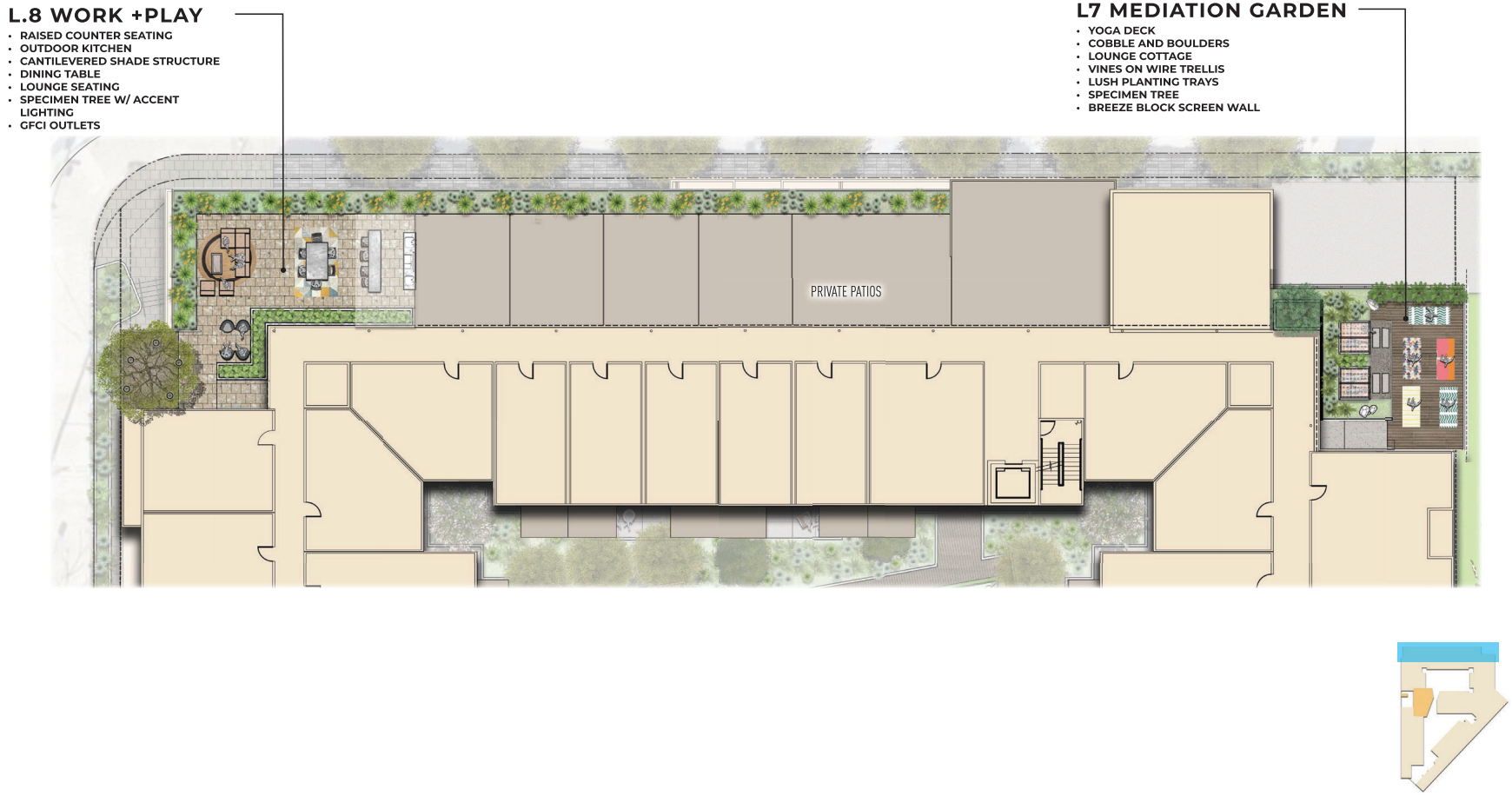


**Figure 9**

Rooftop Landscape Plan (North)

Source: MJS Landscape Architecture, 2024.

Primary pedestrian access to the Project Site would be available along the corner of Manchester Avenue and Truxton Avenue as well as through the ground level courtyard at the intersection of Truxton Avenue and La Tijera Boulevard.

As previously discussed above, per AB 2097, the Project is not required to provide parking as it is a mixed-use project with residential and commercial uses and meets the required transit proximity. Nonetheless, the Project would provide approximately 549 vehicular parking spaces that would be located within two subterranean levels and in Levels 1 and 2 of the proposed building, which would be wrapped in active uses (residential or commercial) and landscaping. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas. In addition, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces).

### 3.3.5 Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site 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. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations and the provisions of the CDO, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

### 3.3.6 Site Security

The Project would include various security features throughout the Project Site. A closed-circuit camera system would be installed, and a keycard would be required for the residential uses. In addition, the building, walkways, and entry points would be properly lit to further the safety and visibility of the Project Site. Furthermore, the design of the Project would enhance safety by reducing dark corners and inconspicuous areas. In addition, the Project would provide a vehicle gate at the transition from commercial parking to residential parking areas of the structure.

### 3.3.7 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. These standards would reduce 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 would include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. Moreover, the Project would increase electrification by installing space heating, water heating, and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas. In addition, the Project would comply with the City's electric vehicle (EV) charging station requirements, which exceed California Building Code Title 24 requirements.

### 3.3.8 Anticipated Construction Schedule and Parking Phasing

Construction of the Project would commence with demolition of the existing buildings and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking, which would extend to a depth of 35 feet below ground surface. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2026 and be completed in 2029. It is estimated that approximately 79,244 cubic yards of earth materials would be hauled from the Project Site.

## 3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This 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 pursuant to LAMC Section 12.22 A.25(g)(3), a Density Bonus Application for a Project having 489 residential dwelling units[8], including 64 units reserved for Very Low-Income Households, with the following Off-Menu Incentives:
  - Off-Menu Incentive, for an increase in the Floor Area Ratio (FAR) to 4.0:1 in lieu of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone;
  - Off-Menu Incentive, for a decrease in the required side yard to 5 feet in lieu of the otherwise required 11 feet in the C2-1 Zone along Truxton Avenue;

[8] *The Project is requesting a total density increase of 85 percent pursuant to AB 1287 by providing 15 percent of by-right units for Very Low Income households and an additional 9 percent of by-right units for Very Low Income households, for a total of 24 percent of by-right units reserved for Very Low Income households, or 64 Very Low Income units*

  - Off-Menu Incentive, for relief from the Downtown Westchester CDO standard 5a, to include residential units on the ground floor in the form of live/work units;

  - Waiver of Development Standard, for relief from Transitional Height requirements pursuant to LAMC Section 12.21.1 A.10 to permit 96 feet within 100-199 feet of an R1 zone instead of a maximum 61 feet; and

  - Waiver of Development Standard, for relief from the Downtown Westchester CDO Standard 5c, to provide a 0-foot setback from the ground floor frontage for the residential floors facing Manchester Avenue in lieu of the otherwise required 5-foot setback.

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within up to 16,120 square feet of commercial space;

- Pursuant to LAMC Section 16.05, Site Plan Review for a development project that results in an increase of 50 or more dwelling units and/or guest rooms;

- Pursuant to LAMC 13.08, Community Design Overlay Compliance review with the design standards and guidelines of the Downtown Westchester CDO;

- Pursuant to Ordinance No. 185,573, Reduction of Required On-Site Trees and payment of an in-lieu fee equivalent to 44 trees, to allow 79 on-site trees in lieu of 123; and

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

## 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). No responsible agencies have been identified for the Project.

# 4 SCEA CRITERIA AND CONSISTENCY ANALYSIS

## 4.1 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 SCAG's 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 new mixed-use building totaling 416,915 square feet, including 400,795 square feet of residential uses and 16,120 square feet of ground-floor commercial space. The Project's residential floor area would comprise approximately 96 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 489 dwelling units on a 2.42-acre (105, 276-square-foot) site, resulting in an overall net residential density of 202.1 units per acre.[9] ***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 stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 15 minutes or less during the morning and afternoon peak commute hours, which in the City of Los Angeles, are between 6:00 A.M. and 9:00 A.M. and between 3:00 P.M. and 7:00 P.M. For overlapping local/express/bus rapid transit lines, SCAG and the City of Los Angeles recognize the

[9] *489 units ÷ 2.42 acres = ~ 202.1 units per acre.*

combined routes to calculate the headway frequency.[10] Furthermore, pursuant to PRC Section 21155(b), this definition 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."

As detailed in the Transportation Assessment and Transit Priority Area Analysis, included as Appendix K.1 and K.3 of this SCEA, Metro Local Bus Route 115, which travels east–west along Manchester Avenue, and Santa Monica BBB Route 3 and Rapid 3, which travels north–south along Sepulveda Boulevard, operate with headways of 15 minutes or less during the morning and afternoon peak hours.[11,12] ***Accordingly, Sepulveda Boulevard and Manchester Avenue both meet the statutory definition of a high quality transit corridor and the intersection of Sepulveda Boulevard and Manchester Avenue therefore qualifies as a major transit stop. Therefore, the Project is consistent with Criterion #3 due to its proximity to both high quality transit corridors and a major transit stop.***

## 4.2 CONSISTENCY WITH A SUSTAINABLE COMMUNITIES STRATEGY

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.

On April 4, 2024, SCAG's Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024). For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035, which the 2024–2050 RTP/SCS intends to meet or exceed. The 2024–2050 RTP/SCS has yet to be accepted by CARB. Nevertheless, both SCAG's 2020-2045 RTP/SCS and 2024–2050 RTP/SCS are considered in this discussion and throughout this SCEA.

SCAG's 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

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[10] *Los Angeles Department of City Planning, Methodology for Determining Bus Transit Service Levels; Implementation of Rapid Bus Provisions of the Transit Oriented Communities Program, April 16, 2024.*

[11] *Gibson Transportation Consultants, Inc., Transportation Assessment for the 6136 Manchester Avenue Residential Project, Los Angeles, California, December 2022, revised August 2024. See Appendix K.1 of this SCEA.*

[12] *Gibson Transportation Consultants, Inc., Transit Priority Area Analysis for the 6136 Manchester Avenue Project, Los Angeles, California, May 20, 2024. See Appendix K.3 of this SCEA.*

to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about what type of development goes where.

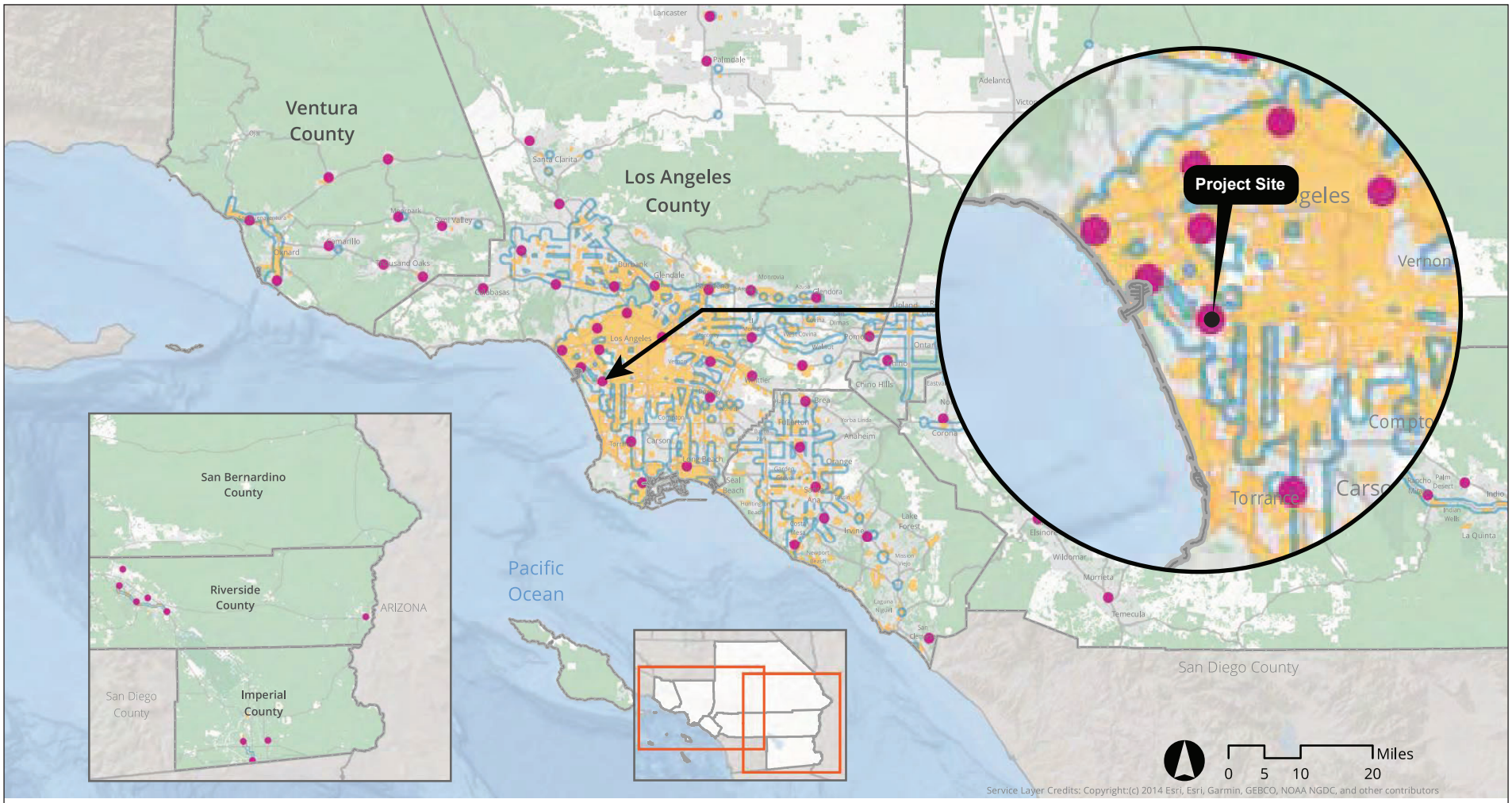
### 4.2.1 Use Designation, Density, and Building Intensity

#### 2020–2045 RTP/SCS

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 emissions. 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 of housing types and affordability options. To facilitate 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 the 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 regional 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 2020–2045 RTP/SCS.

The Project's location relative to each of the PGAs is shown in Figure 10 through Figure 16 on pages 29 through 35 of this SCEA. As shown in Figure 14, Figure 15, and Figure 16, the Project Site is located within the boundaries of a Job Center, a TPA, an HQTA and an NMA, and near a Livable Corridor, as described below:

- Job Centers: Job Centers are where regional strategies that support economic prosperity can be deployed in catalytic ways. Job Centers have been identified in all six counties in the SCAG region and represent areas that have a significantly higher employment density than surrounding areas. Job Centers represent areas with local employment peaks rather than simply places with the most jobs. Identified Job Centers are present in over 60 percent of the region's cities and contain about one-third of Southern California's jobs – but only cover less than 1 percent of the region's land area. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced. The Project Site is located within a Job Center.




Priority Growth Areas vs. Regional Growth Constraints

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

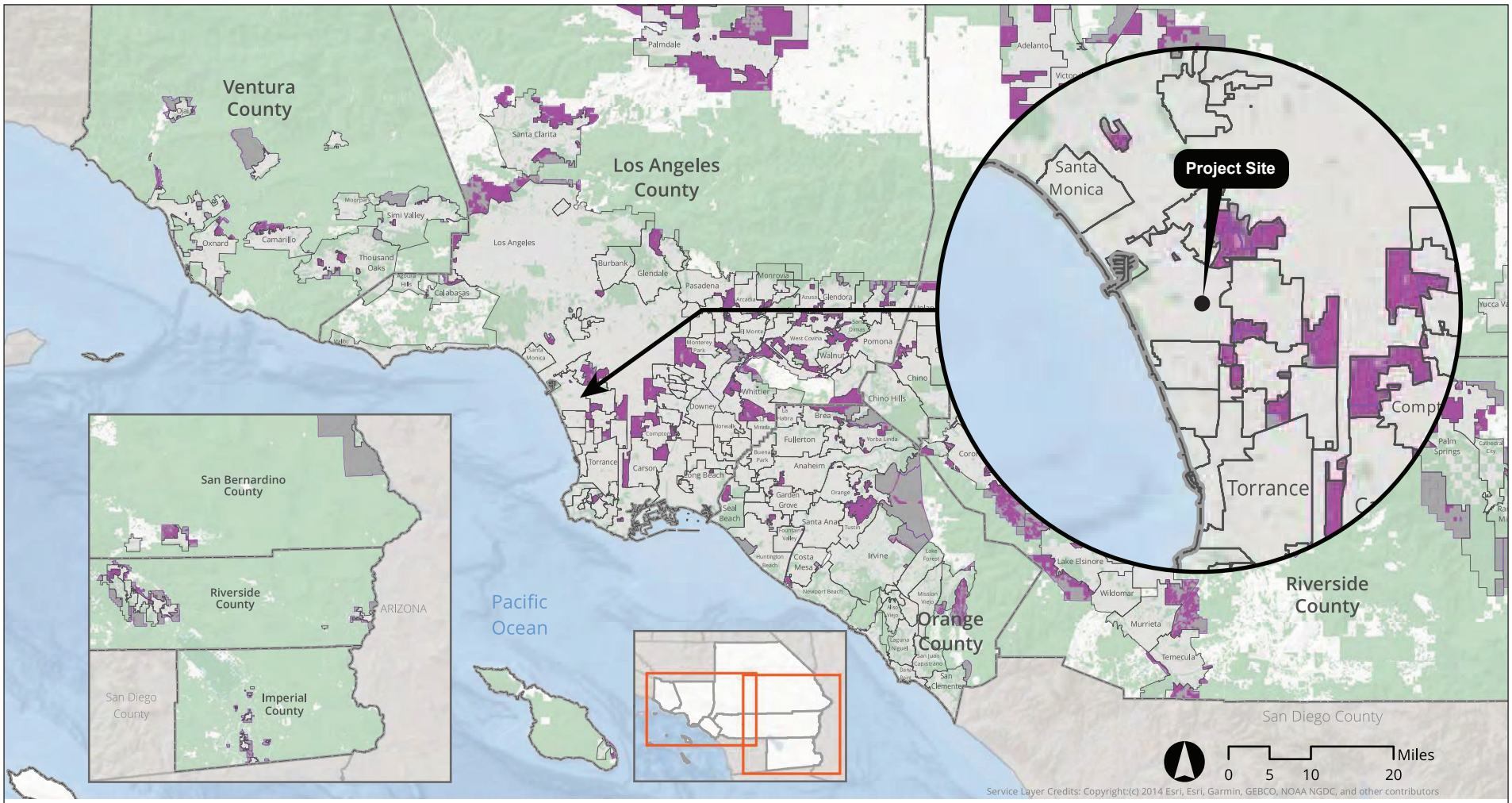
Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints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

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

**Figure 10**

Priority Growth Areas vs. Regional Growth Constraints

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




County Boundaries
City Boundaries
Sphere of Influence
Regional Growth Constraints

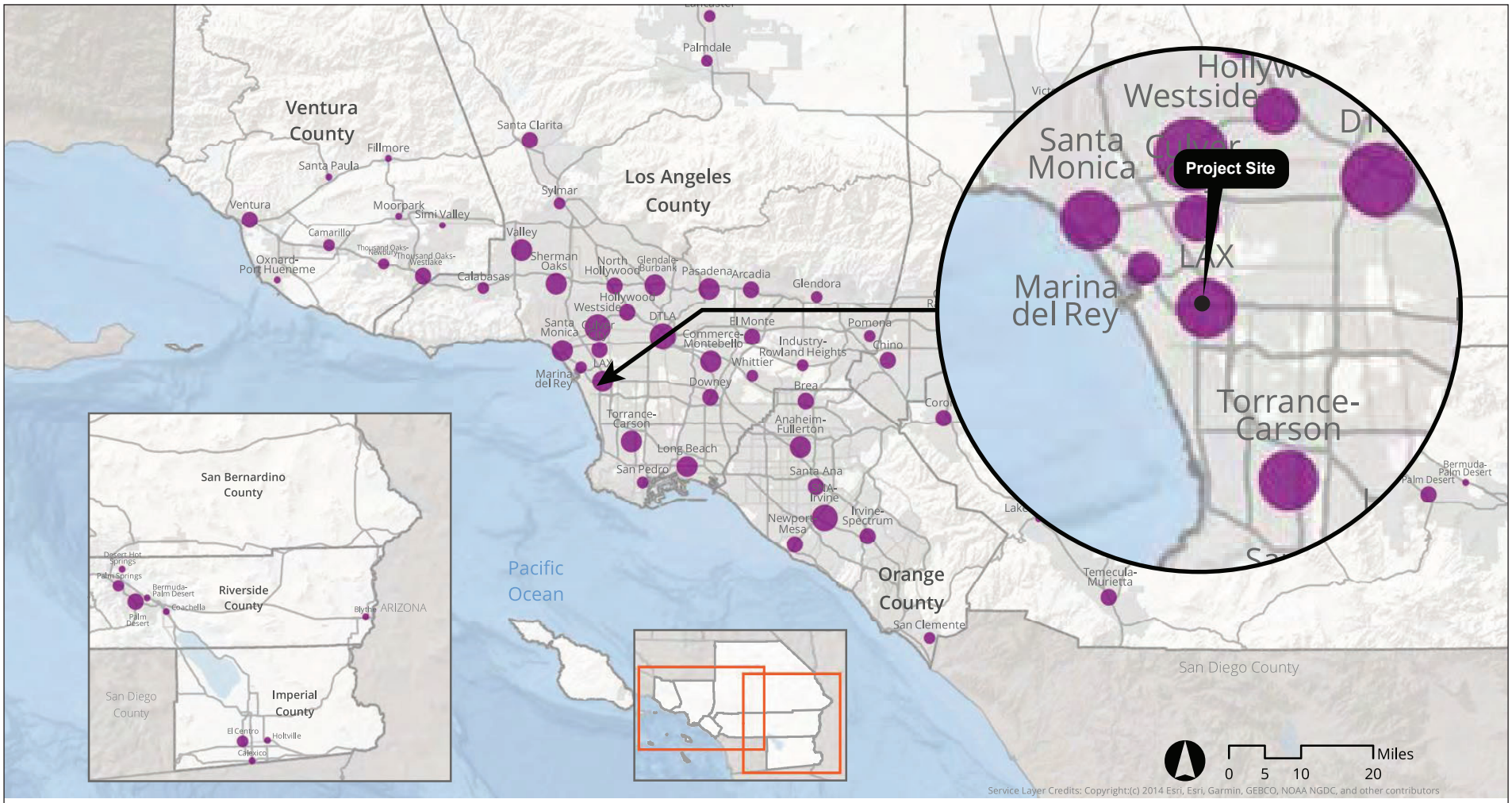
Source: Counties and local jurisdictions LAFCO in SCAG region, 2018

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 11**

Priority Growth Area—Spheres of Influence

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




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)

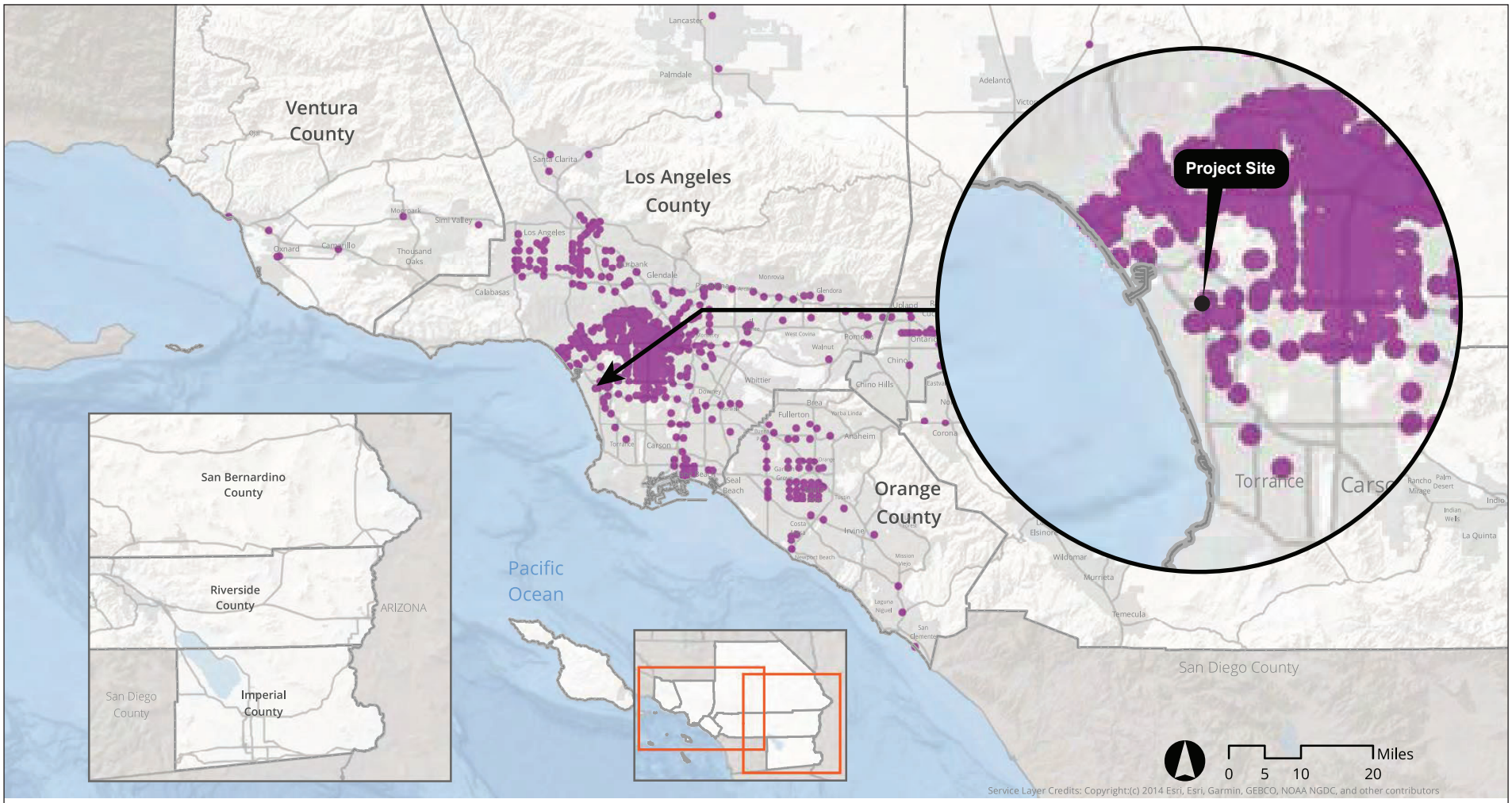
Source: SCAG, 2019

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.

**Figure 12**

Priority Growth Area—Job Centers

Source: SCAG, 2023.




Transit Priority Areas (2045)

TPA

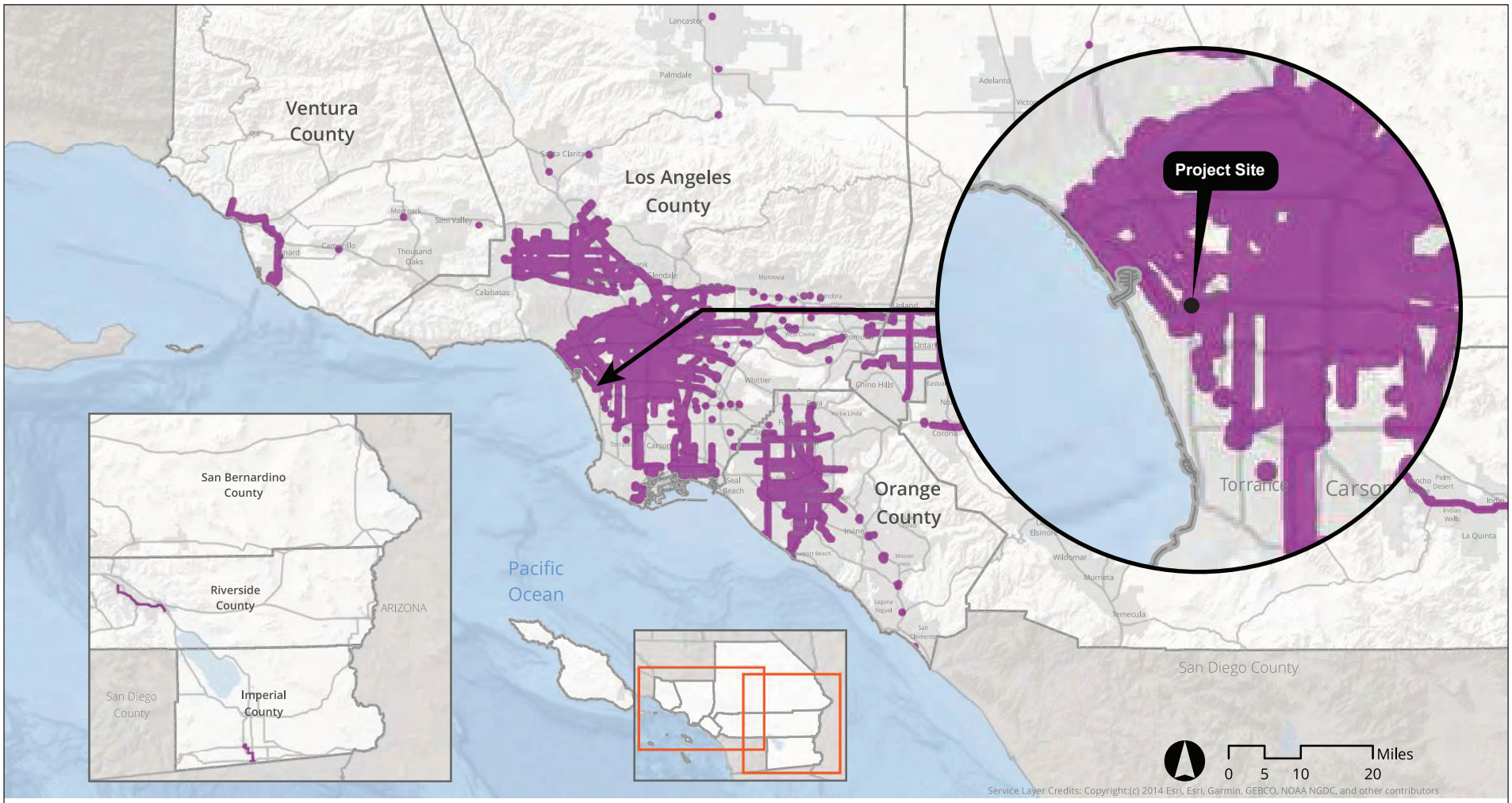
Source: County Transportation Commissions, SCAG, 2019

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 13**

Priority Growth Area—Transit Priority Areas

Source: County Transportation Commissions, SCAG, 2023.




High Quality Transit Areas (2045)

HQTA

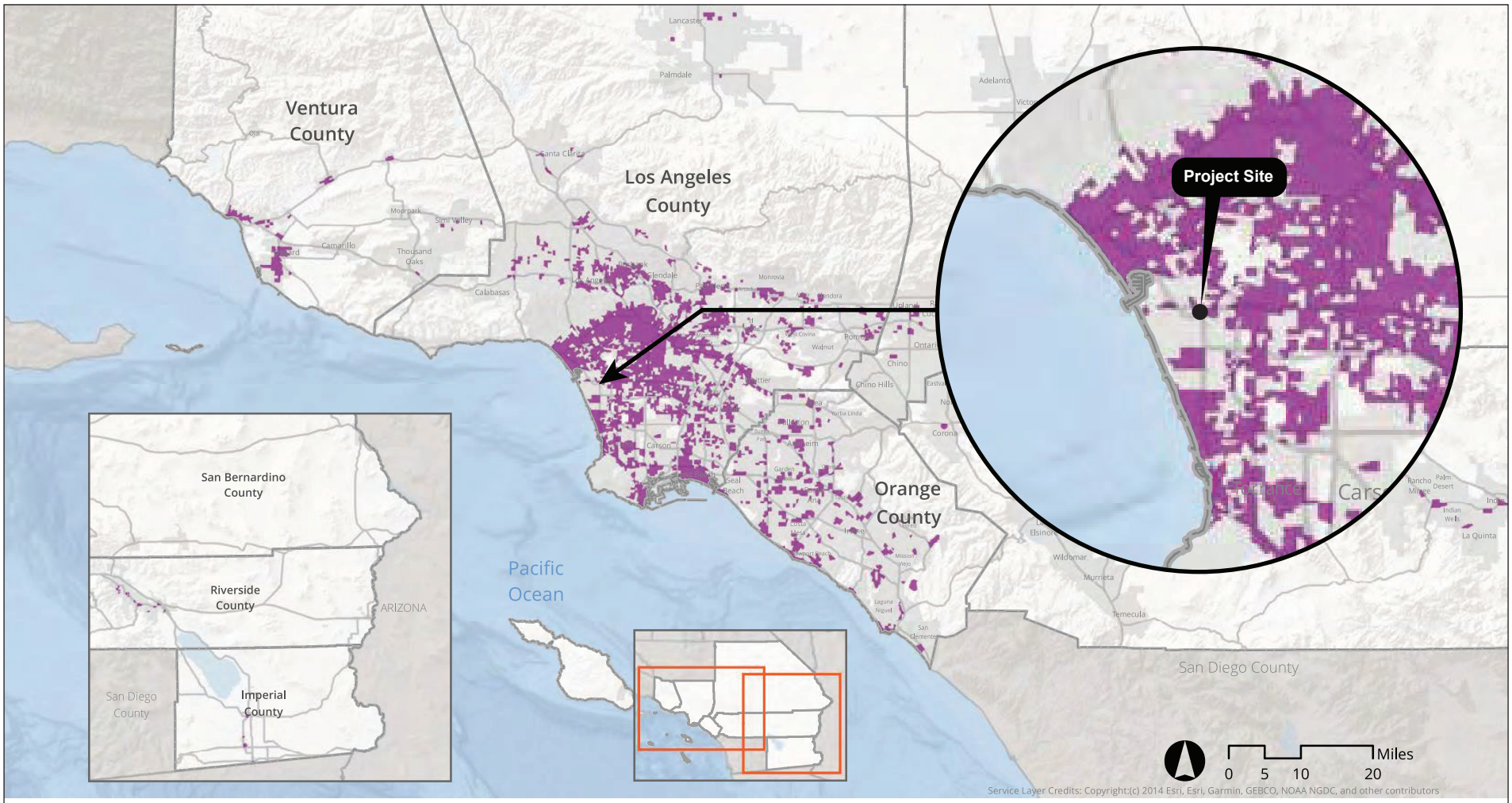
Source: County Transportation Commissions, SCAG, 2019

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 14**

Priority Growth Area—High Quality Transit Areas

Source: County Transportation Commissions, SCAG, 2023.




Neighborhood Mobility Areas (NMA)

NMA

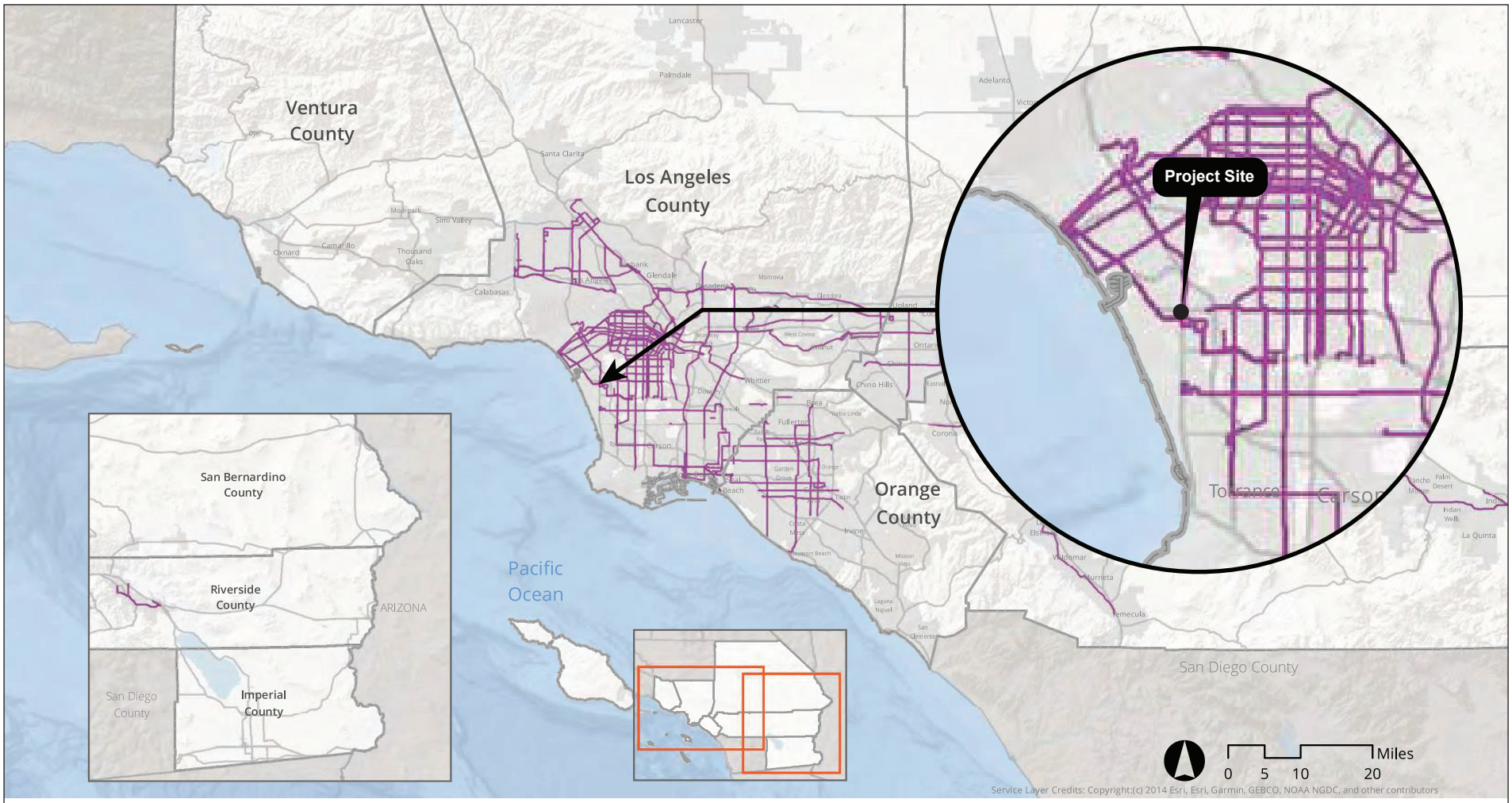
Source: SCAG, 2019

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 15**

Priority Growth Area—Neighborhood Mobility Areas

Source: SCAG, 2023.




Livable Corridors

Livable Corridors

Source: SCAG, 2019

**Figure 16**

Priority Growth Area—Livable Corridors

Source: SCAG, 2023.

- Transit Priority Areas: TPAs are Priority Growth Areas that are within one half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. TPAs are 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 the intersection of Sepulveda Boulevard and Manchester Avenue which both have transit routes with a 15-minute or less service frequency during peak commute hours.[13]

- 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 the intersection of Sepulveda Boulevard and Manchester Avenue, which is a qualifying major transit stop.[14]

- 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.[15]

- 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 nearest Livable Corridor to the Project Site is Sepulveda Boulevard, located approximately 0.18 mile west of the Project Site.[16]

The Project's location, scale, and mixture of land uses would be consistent with its designation within these five PGAs, which, in turn, indicates consistency with the use designations, density, and building

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[13] *SCAG, TPA, https://gisdata-scag.opendata.arcgis.com/datasets/d1be0e8e35f94522bf37132f5454f42c_0/explore?location=33.957160%2C-118.397199%2C14.98, accessed June 23, 2024.*

[14] *SCAG, HQTA, https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areas-hqta-2045-scag-region/explore?location=33.959921%2C-118.383624%2C16.62, accessed May 17, 2024.*

[15] *SCAG, NMA, https://gisdata-scag.opendata.arcgis.com/datasets/neighborhood-mobility-areas-nma-scag-region/explore?location=33.959097%2C-118.383628%2C16.62, accessed May 17, 2024.*

[16] *SCAG, Livable Corridors, https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::livable-corridors-scag-region/explore?location=33.959747%2C-118.344784%2C14.11, accessed May 17, 2024.*

intensity of the SCS. Specifically, the Project Site is located in an urbanized area within the Westchester–Playa del Rey Community Plan Area of the City.

The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low-to mid-rise buildings containing commercial and residential uses. The Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space on a site that is well-served by transit. As noted above, the Project is approximately 96 percent residential, with the residential component of the Project consisting of 229 studios, 172 one-bedroom units (including six (6) one-bedroom live-work units), and 88 two-bedroom units, thereby providing housing diversity. The Project would contain a total of 416,915 square feet with a FAR of 4:1. 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. The Project Site is located near several bus lines, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6, several of which lines provide peak commute hour headways of 15 minutes or less, thereby providing nearby high-frequency and high-quality transit options. Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, including approximately 43,235 square feet of common open space consisting of approximately 30,830 square feet of exterior common open space and approximately 12,405 square feet of interior common open space; and 8,150 square feet of private open space. Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would create a community focal point and expand the existing commercial hub. It would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. In addition, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). Pedestrian-scaled design and pedestrian and 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, mix of 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., Job Center, TPA, 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.

**2024–2050 RTP/SCS**

SCAG's 2024–2050 RTP/SCS introduces Priority Development Areas (PDAs), which are areas within the SCAG region where future growth can be located to help the region reach the 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. PDAs are a technical tool used for different purposes, such as growth visioning, performance measurement or grant applications. However, as a general principle, development in overlapping PDAs indicates a greater alignment with the 2024–2050 RTP/SCS goals. PDAs include NMAs, TPAs, Livable Corridors, and SOIs (in unincorporated areas only).

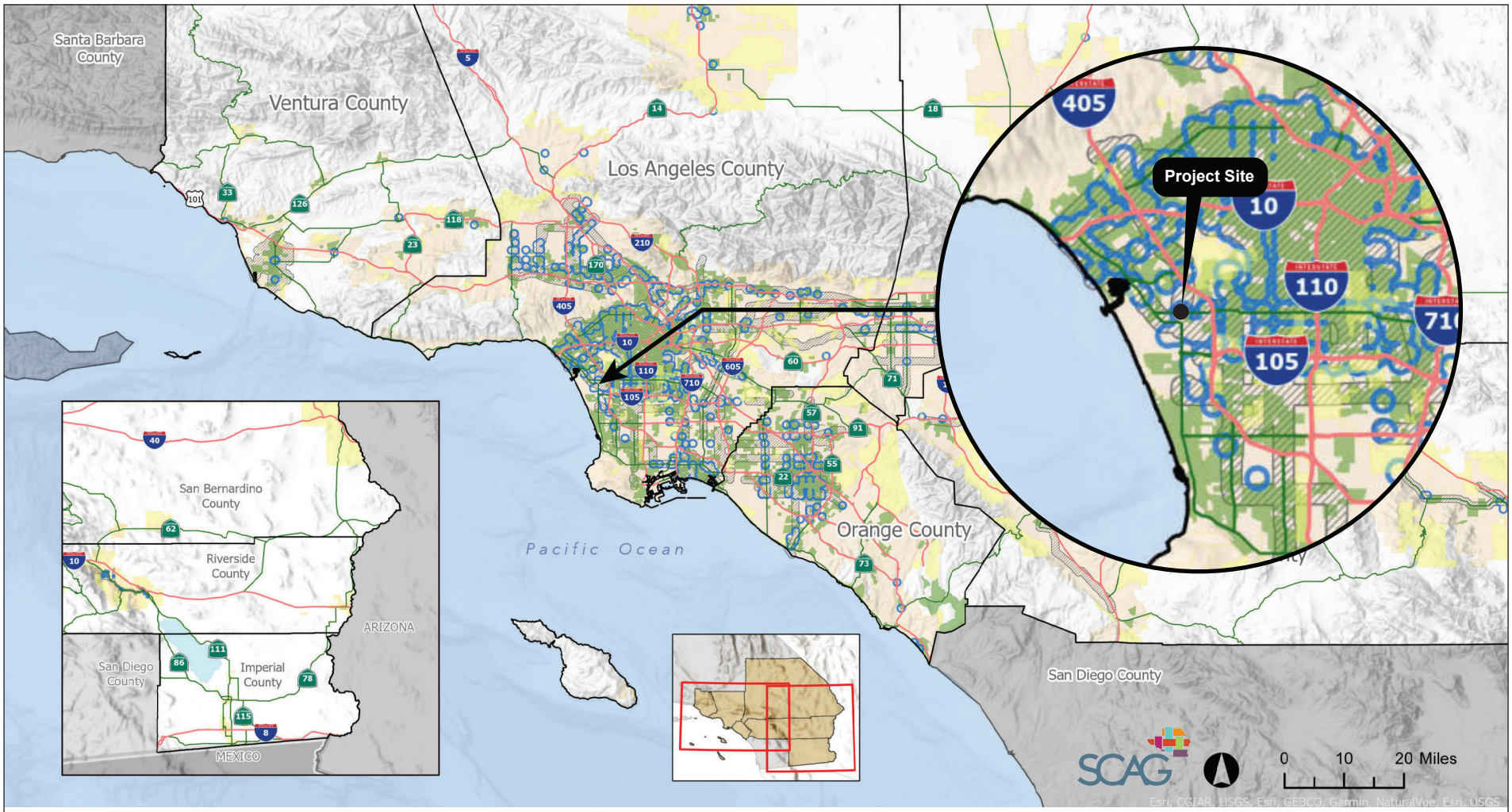
PDAs follow the principles of center-focused placemaking, providing locations where many of the 2024–2050 RTP/SCS strategies can be fully realized. According to the 2024–2050 RTP/SCS, PDAs account for only 8.2 percent of the region's total land area; however, implementation of SCAG's recommended growth strategies will help these areas accommodate 66 percent of forecasted household growth and 54 percent of forecasted employment growth between 2019 and 2050. The more compact form of regional development implemented through PDAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. The PDAs are shown in Map 3.4 of the 2024–2050 RTP/SCS.

The Project's location relative to PDAs, including NMAs, TPAs, Livable Corridors, and SOIs, is shown in Figure 17 on page 39 of this SCEA. As shown in Figure 17, the Project Site is located within the boundaries of a TPA and an NMA, and near a Livable Corridor, as described below:

- Transit Priority Areas: TPAs are areas within 0.5 mile of existing or planned major transit stops in the region. A major transit stop is defined in state statute as a site containing an existing or planned rail or bus rapid transit station, a ferry terminal served by either 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 people can live, work and play in higher-density, compact communities that are conducive to complete streets that facilitate access to high frequency transit with safe and comfortable walking and biking networks. The Project Site is located within a TPA due to its proximity to the intersection of Sepulveda Boulevard and Manchester Avenue which both have transit routes with a 15 minute or less service frequency during peak commute hours, resulting in this intersection qualifying as a major transit stop.[17]

- Neighborhood Mobility Areas: NMAs include four elements that reflect potential to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways and other destinations. The four elements of an NMA are: 1) intersection density, 2) low-speed streets, 3) land use diversity, and 4) accessibility to amenities within one mile using street network distances. The Project Site is located within a mapped NMA.

[17] *SCAG, TPA, https://gisdata-scag.opendata.arcgis.com/datasets/d1be0e8e35f94522bf37132f5454f42c_0/explore?location=33.957160%2C-118.397199%2C14.98, accessed June 23, 2024.*




SCAG: Connect SoCal 2024 **MAP 3.4 Priority Development Areas**

- Livable Corridor (LC)
- Neighborhood Mobility Area (NMA)
- Sphere of Influence (SOI)
- Transit Priority Area (TPA)
- SCAG Counties
- City Boundaries
- Freeway/Toll Road
- Other State Highway

**Figure 17**
Priority Development Areas

Source: SCAG, 2023.

- Livable Corridors: Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. This strategy integrates transit improvements and certain active transportation improvements to support safe bicycling and walking. The Project Site is located within a mapped Livable Corridor.

The Project's location, scale, and mixture of land uses would be consistent with its designation within these three PDAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. As previously discussed, the Project Site is located in an urbanized area within the Westchester–Playa del Rey Community Plan Area of the City. The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low-to mid-rise buildings containing commercial and residential uses. The Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space on a site that is well-served by transit. As noted above, the Project is approximately 96 percent residential, with the residential component of the Project consisting of 229 studios, 172 one-bedroom units (including six (6) one-bedroom live-work units), and 88 two-bedroom units, thereby providing housing diversity. The Project would contain a total of 416,915 square feet with a FAR of 4:1. The Project would significantly increase the housing supply in the Project area, as well as housing diversity and affordability in the PDAs in which the Project Site is located. The Project Site is located near several bus lines, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6, several of which lines provide peak commute hour headways of 15 minutes or less, thereby providing nearby high-frequency and high-quality transit options. Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, including approximately 43,235 square feet of common open space consisting of approximately 30,830 square feet of exterior common open space and approximately 12,405 square feet of interior common open space; and 8,150 square feet of private open space. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. In addition, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). The pedestrian-scaled design of the Project and pedestrian and 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, mix of 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 PDAs. Furthermore, the Project would be consistent with the intent of the specific PDAs in which it is located (i.e., TPA, NMA, and Livable Corridor). As such, the Project would be consistent with the 2024–2050 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.

### 4.2.2 Sustainable Communities Strategy Policy Consistency

## 2020–2045 RTP/SCS

Chapter 3*, A Path to Greater Access, Mobility, and Sustainability*, 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 of these strategies and measures are directly tied to supporting related GHG reductions while others support the broader goals of the 2020–2045 RTP/SCS. As outlined in Table 2 on page 42, 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 Table 17 on page 246 in Section 5, Evaluation of Environmental Impacts, of this SCEA.

**Table 2**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| **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 mixed-use development that would include market-rate and affordable residential units and retail/restaurant uses within a PGA. Consistent with the Project Site's location within a Job Center, TPA, HQTA, and NMA and adjacent to a Livable Corridor, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations. Therefore, the Project would be consistent with this strategy. |
| 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 489 new market-rate and affordable residential dwelling and live-work units within the Westchester–Playa del Rey Community Plan Area of the City. The Project Site is located in an urban area near commercial and job centers. Furthermore, the Project Site is served by a variety of public transit options provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Specifically, transit options in the vicinity of the Project Site include Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6, several of which lines provide peak commute hour headways of 15 minutes or less. Therefore, the Project would be consistent with this strategy. |
| Plan for growth near transit investments and support implementation of first/last mile strategies | **Consistent.** As discussed above, the Project Site is served by a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. Thus, the Project would provide for growth near transit investment.<br><br>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 promote first/last mile infrastructure by providing 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces), easy bicycle accessibility to the Project Site to encourage alternative mobility for employees and visitors to the Project Site, and provide five-foot dedications along the Project frontage on La Tijera Boulevard and Manchester Avenue to meet the street dedication widths required by the City. Therefore, the Project would be consistent with this strategy. |
| Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses | **Consistent.** While this measure is directed toward public agencies, the Project would support its implementation. The Project would replace commercial uses with a new mixed-use building with multi-family residential units and ground floor commercial uses. Specifically, the Project would include the development of a new approximately 416,915-square-foot building comprised of 489 residential and live- |

**Table 2 (Continued)**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| | work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The Project would be designed to complement adjacent uses and enhance the surrounding area, creating an inviting atmosphere. Therefore, the Project would be consistent with this strategy. |
| Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods | **Consistent.** The Project would replace commercial uses with a new mixed-use building with multi-family residential units and ground floor commercial uses. Specifically, the Project would include the development of a new approximately 416,915-square-foot building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The Project would provide a variety of open space and recreational amenities, including a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would serve to create a community focal point and expand the existing commercial hub. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes an 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Thus, the Project would represent infill development that would accommodate growth, increase amenities, and enhance connectivity to existing neighborhoods. Therefore, the Project would be consistent with this strategy. |
| 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 a mix of uses, including 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space 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 a 2,345-square-foot public plaza on the southern end of the Project Site, landscaping, and ground floor commercial uses, that would contribute to the |

**Table 2 (Continued)**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| | walkability of the area. In addition, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces) to encourage bicycling and walking for residents, employees, and visitors to the Project Site. Furthermore, the Project would expand residential and employment opportunities in proximity of residential and commercial areas, destinations, and other neighborhood services in a diverse urban area. Therefore, the Project would be consistent with this strategy. |
| **Strategy: Promote Diverse Housing Choices** | |
| Preserve and rehabilitate affordable housing and prevent displacement. | **Consistent.** The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. Thus, the Project would not displace any housing. Rather, the Project would develop 489 residential and live-work units (inclusive of 64 Very Low-Income Households). Therefore, the Project would be consistent with this strategy. |
| 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 64 Very Low-Income units. In addition, the Project would include 16,120 square feet of commercial space, which would generate new employment opportunities. Therefore, the Project would be consistent with this strategy. |
| 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 489 new market-rate and affordable multi-family residential and live-work 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 individual projects. However, the Project would support the reduction of 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, LEED Silver equivalency, 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, Energy Star–labeled appliances, and drought-tolerant planting. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable. Therefore, the Project would be consistent with this strategy. |

**Table 2 (Continued)**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| **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. Therefore, the Project would be consistent with this strategy. |
| 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 emissions, as outlined above in Section 3, Project Description, of this SCEA. Therefore, the Project would be consistent with this strategy. |
| 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 an HQTA, Job Center, TPA, and NMA and adjacent to a Livable Corridor based on the 0.18-mile walking distance to the intersection of Sepulveda Boulevard and Manchester Avenue, which both have transit routes with a 15 minute or less service frequency during peak commute hours. Therefore, the Project would be consistent with this strategy. |
| 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. |

**Table 2 (Continued)**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| 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 urban heat islands, the Project would include extensive landscaping, thereby reducing the potential for urban heat islands. Therefore, the Project would be consistent with this strategy. |
| 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 and visitors. Thus, the Project would promote resource efficient development. Therefore, the Project would be consistent with this strategy. |
| 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 Item IV, Biological Resources, in Section 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 a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated parking. The Project Site is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). No resource areas or agricultural lands would be impacted |

**Table 2 (Continued)**
**Consistency with 2020–2045 RTP/SCS Strategies/Measures**

| Strategy/Measure | Consistency Assessment |
|---|---|
| | by the Project. Therefore, the Project would be consistent with this strategy. |
| *Source: SCAG, 2020–2045 RTP/SCS, September 2020; Eyestone Environmental, 2024.* | |

## 2024–2050 RTP/SCS

Chapter 3, *The Plan*, of the 2024–2050 RTP/SCS outlines goals and subgoals that are intended to help the SCAG region achieve a healthy, prosperous, accessible, and connected region for a more resilient and equitable future. As outlined in Table 3 on page 48, the Project would be consistent with applicable goals and subgoals of the 2024–2050 RTP/SCS. A discussion of the Project's consistency with the applicable goals and subgoals, as well as a more general discussion of the Project's consistency with the applicable policies, of the 2024–2050 RTP/SCS is included in Table 18 on page 251 in Section 5, Evaluation of Environmental Impacts, of this SCEA.

**Table 3**
**Consistency with 2024–2050 RTP/SCS Goals and Subgoals**

| Goals/Subgoals | Consistency Assessment |
|---|---|
| Mobility: Build and maintain an integrated multimodal transportation network. | **Consistent**. While this goal 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. The Project would be developed within an existing urbanized area that has an established multimodal transportation network. As previously discussed, the Project Site is served by a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. Consistent with the Project Site's location within a PDA, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations. Therefore, the Project would be consistent with this goal. |
| Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions. | **Consistent.** As discussed under Item III, Air Quality and VIII, Greenhouse Gas Emissions, in Section 5, Evaluation of Environmental Impacts, of this SCEA, the Project would result in less-than-significant impacts related to air quality and GHG emissions during construction and operation. As previously discussed, the Project would construct a new residential development within a City-designated TPA. Specifically, the Project Site is served by a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6, and the intersection of Sepulveda Boulevard and Manchester Avenue qualifies as a major transit stop. Additionally, the Project would support and promote environmental sustainability by complying with regulatory requirements and the sustainability intent of the U.S. Green Building Council's LEED Silver or equivalent green building standards. These features include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. In addition, the Project would meet the Los Angeles Green Building Code Requirements for new parking facilities capable of supporting future EVSE, as well as parking spaces equipped with EV charging stations. Furthermore, the Project would include the provision of 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). These features would reduce GHG emissions and improve air quality. Therefore, the Project would be consistent with this subgoal. |
| Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities. | **Consistent**. While this subgoal is directed toward local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. As discussed above, the Project Site is served by a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT CE Route 574, |

**Table 3 (Continued)**
**Consistency with 2024–2050 RTP/SCS Goals and Subgoals**

| Goals/Subgoals | Consistency Assessment |
|---|---|
| | Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. The Project would also include the provision of 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). Therefore, the Project would be consistent with this subgoal. |
| Support planning for people of all ages, abilities and backgrounds. | **Not Applicable.** This subgoal is directed toward public agencies as a policy strategy and does not apply to individual projects. |
| Communities: Develop, connect and sustain livable and thriving communities. | **Consistent**. While this goal is directed toward local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. The Project would consist of a mixed-use development that would include market-rate and affordable residential units and retail/restaurant uses within a PDA. Given the Project Site's location in an urbanized area, the Project would be located in proximity to employment, destinations, and other neighborhood services, and transit. Therefore, the Project would be consistent with this goal. |
| Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances. | **Consistent**. The Project would consist of a mixed-use development that would include market-rate and affordable residential units and retail/restaurant uses on an already developed urban infill site in a highly developed area of the City. The Project would be located in proximity to employment, destinations, and other neighborhood services, and transit, resulting in a synergistic development where people can live, work, and be entertained. In addition, the Project would promote use of bicycles by providing a total of 234 bicycle parking spaces for the residential and commercial uses. Overall, the Project's design and proximity to transit and other uses would increase mobility options and reduce travel distances. Therefore, the Project would be consistent with this subgoal. |
| Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. | **Consistent**. The Project would provide a range of unit types. Specifically, the Project would provide 489 residential and live-work units (inclusive of 64 Very Low-Income Households) comprising 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units. The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking and does not contain residential uses. Therefore, the Project would not displace housing. As such, the Project would produce diverse housing types in an effort to improve affordability, accessibility and opportunities for all households. Therefore, the Project would be consistent with this subgoal. |
| Environment: Create a healthy region for the people of today and tomorrow. | **Consistent**. While this goal and these subgoals are directed toward SCAG and/or public agencies as policy strategies and do not apply to individual projects, the Project would support their implementation. The Project's location, |

**Table 3 (Continued)**
**Consistency with 2024–2050 RTP/SCS Goals and Subgoals**

| Goals/Subgoals | Consistency Assessment |
|---|---|
| Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.<br><br>Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water. | land use characteristics, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. 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 CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, improve climate resiliency and reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Sustainability features include, but would not be limited to: use of environmentally-friendly building materials such as non-toxic paints; high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and drought tolerant planting. These measures would also support resource efficiency by conserving water and energy. Therefore, the Project would be consistent with this goal and these subgoals. |
| Conserve the region's resources. | **Consistent.** While this subgoal 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. As previously discussed, the Project would consist of a mixed-use development that would include market-rate and affordable residential units and retail/restaurant uses on an already developed urban infill site in a highly developed area of the City. It would not include development of an undeveloped site; therefore, the Project would conserve natural areas and open space. In addition, the Project would comply with applicable energy, water, and other conservation requirements. Specifically, the Project would incorporate energy, water, and other natural resource conservation features into the Project required by State Title 24 and the City of Los Angeles Building Code. The Project would also implement the additional sustainability features outlined in Section 3, Project Description, of this SCEA.<br><br>Based on the above, the Project would be consistent with this subgoal. |
| Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region. | **Consistent**. While this goal and subgoal is directed toward SCAG as a policy strategy and does not apply to individual projects, the Project would support its implementation. The Project would consist of a mixed-use development including market-rate and affordable live/work residential units and commercial uses on an urban infill site within a highly urbanized area of the City. These uses would provide increased housing, employment, and dining opportunities to the area. Therefore, the Project would be consistent with this goal. |

**Table 3 (Continued)**
**Consistency with 2024–2050 RTP/SCS Goals and Subgoals**

| Goals/Subgoals | Consistency Assessment |
|---|---|
| Improve access to jobs and educational resources. | **Not Applicable.** This subgoal is directed toward public agencies as a policy strategy and does not apply to individual projects. |
| Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities. | **Not Applicable.** This subgoal is directed toward SCAG as a policy strategy and does not apply to individual projects. |

*Source: SCAG, 2024–2050 RTP/SCS, April 2024; Eyestone Environmental, 2024.*

# 5 EVALUATION OF ENVIRONMENTAL IMPACTS

## 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 [California Code of Regulations Title 14, Chapter 3, 15000-15387]). Pursuant to Public Resources Code (PRC) Section 21155.2(b), the SCEA is 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.

As the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura), the Southern California Association of Governments (SCAG) is required under Senate Bill 375 to incorporate a Sustainable Communities Strategy into its regional transportation plans. On September 3, 2020, SCAG approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal). As an update to the 2020–2045 RTP/SCS, SCAG's Regional Council adopted the 2024–2050 RTP/SCS (also known as Connect SoCal 2024) on April 4, 2024. However, the 2024–2050 RTP/SCS has yet to be adopted by CARB. As such, both SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are considered in this discussion and throughout this SCEA.

Program Environmental Impact Reports (PEIRs) were prepared to evaluate the potential environmental impacts of SCAG's 2020–2045 RTP/SCS[18] as well as SCAG's 2024–2050 RTP/SCS.[19]

As part of the PEIRs, mitigation measures were included that would reduce potentially significant impacts identified in the PEIRs. The complete list of the mitigation measures identified in the PEIRs are included in Exhibits A, Mitigation Monitoring and Reporting Program (MMRP), of the 2020–2045 and 2024–2050 RTP/SCS Final PEIRs. The mitigation measures in the PEIRs 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 (SMMs) are intended to be implemented by SCAG over the lifetime of the RTP/SCS. Project-level mitigation measures (PMMs) are intended to be considered by lead agencies for projects proposing to streamline the environmental review process pursuant to Senate Bill (SB) 375, SB 743, or SB 226, such as the Project.

Project-level mitigation measures outlined in the 2020–2045 and 2024–2050 RTP/SCS PEIRs should be considered and implemented by a lead agency and Project Applicant during project-specific environmental reviews, as applicable and feasible, where the lead 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

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[18] *SCAG, Certified Final PEIR for the 2020–2045 RTP/SCS, May 2020.*

[19] *SCAG, Certified Final PEIR for the 2024–2050 RTP/SCS, April 2024.*

the mitigation measures identified in the PEIRs 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 and 2024–2050 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 State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) SCAG's MMRP mitigation measure; (2) an equally 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 new project design features (PDFs) and/or mitigation measures shall be identified in this section to help reduce or avoid all potentially significant impacts on the environment.

The SCEA is also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs. Where it has been determined that a cumulative effect has been adequately addressed and mitigated, 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 by the City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Department of City Planning, and also includes other projects in the area based on recent studies. The list of related projects within 1 mile of the Project Site (which is within a 0.25-mile radius of the farthest outlying intersection, as suggested by LADOT's Transportation Assessment Guidelines) is provided in Table 36 on page 390 and shown in Figure 18 on page 391 found under Item XXI, Mandatory Findings of Significance. Although these projects serve as context for the development environment in the Project vicinity, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessment of Project impacts.

# I. AESTHETICS

*SB 743 [PRC Section 21099(d)] sets forth guidelines for evaluating project transportation impacts 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(a) defines a "transit priority area" (TPA) 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 or applicable regional transportation plan." PRC Section 21064.3 defines "major transit stop" as "a site containing any of the following: (a) [a]n existing rail or bus rapid transit station, (b) [a] ferry terminal served by either a bus or rail transit service, or (c) [t]he intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "infill site" as a "lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified*

*urban uses." This state law supersedes the aesthetic impact 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 (City) 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."*[20]

*PRC Section 21099 applies to the Project. Specifically, the Project is a mixed-use residential project located within an infill site and located approximately 0.25-miles walking distance to the intersection of Sepulveda Boulevard and Manchester Avenue which both have transit routes with a 15 minute or less service frequency during peak commute hours.*[21] *Therefore, the Project's aesthetic impacts would not be considered significant impacts on the environment. The aesthetic analysis in this SCEA is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment.*

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

[20] *City of Los Angeles Department of City Planning, ZI File ZA No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.*

[21] *Gibson Transportation Consultants, Inc., Transit Priority Area Analysis for the 6136 Manchester Project, Los Angeles, California, May 20, 2024. See Appendix K.3 of this SCEA.*

**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, Mitigation Measure PMM AES-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project. However, consistent with Mitigation Measure PMM AES-1 (g) from the 2020–2045 RTP/SCS PEIR as well as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project to screen construction activities from view.

**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;

  – 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 herein 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 from the 2020–2045 RTP/SCS PEIR addresses visual character, it is not applicable to the Project. However, the Project would incorporate some of the design elements outlined in this mitigation measure, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines including those contained in the CDO, and maintaining the Project Site such that blight or nuisance conditions do not occur.

**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 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project. However, as part of the Project, some of the design elements outlined in Mitigation Measure PMM AES-3 from the 2020–2045 RTP/SCS PEIR would be incorporated, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM AES-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.

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

e) Provide new corridor landscaping that provides appropriate transitions to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.

f) 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.

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

***Applicability to the Project***

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, Mitigation Measure PMM AES-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project. However, consistent with Mitigation Measure PMM AES-1 (f) from the 2024–2050 RTP/SCS PEIR as well as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project to screen construction activities from view.

**PMM AES-2:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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 substantial natural elements and visual interest to soften the hard-edged, linear transportation corridors.

c) Develop 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) Keep sites 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, account for visual impacts during sound wall construction and design methods as follows:

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

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

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

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

***Applicability to the Project***

The Project is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included herein 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 from the 2024–2050 RTP/SCS PEIR addresses visual character, it is not applicable to the Project. However, the Project would incorporate some of the design elements outlined in this mitigation measure, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines including those contained in the Downtown Westchester Community Design Overlay regulations, and maintaining the Project Site such that blight or nuisance conditions do not occur.

**PMM AES-3:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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 shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.

b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7 a.m. to 10 p.m.

c) Use energy-efficient, low-glare 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 that do not include light-sensitive uses.

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

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

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

i) Direct architectural lighting onto the building surfaces and have low reflectivity to minimize glare and limit light spillover 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 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project. However, as part of the Project, some of the design elements outlined in Mitigation Measure PMM AES-3 from the 2024–2050 RTP/SCS would be incorporated, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

**Impact Analysis**

**a. Would the project have a substantial adverse effect on a scenic vista?**

**No Impact.** A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

The Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial and residential uses. No panoramic views of valued visual resources are currently available from the Project Site. With regard to focal views, valued visual resources in the vicinity of the Project Site include historical resources such as structures within the Westchester Triangle Commercial Historic District (Historic District) to the west across Truxton Avenue. However, as previously discussed, the Project Site is located in a heavily urbanized area and the Project vicinity is currently developed. Implementation of the Project would occur within the boundaries of the existing Project Site and would not alter existing views of the Historic District from Truxton Avenue; therefore, existing views of the Historic District and associated structures would remain.

***Based on the above, due to the urbanized nature of the area, the Project would not block or obstruct views of visual resources. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista, and no impact would occur.***

**b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** The Project Site is not located along a state scenic highway. The nearest officially eligible (not yet designated) state scenic highway is along California State Route 210 (SR-210), which is located approximately 12.5 miles northwest of the Project Site.[22] ***Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to or near the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impacts would occur.***

**c. In non-urbanized areas, would the project 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?**

**No Impact.** The Project Site is located within an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. With regard to zoning, as discussed in Section 3, Project Description, of this SCEA, the Project Site is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). The Q condition was established in 2008, which changed the zone from C2-1 to [Q]C2-1-CDO. Pursuant to the LAMC, the C2 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. The "1" indicates that the Project Site is located in Height District 1, which in conjunction with the C2 Zone, does not impose a maximum building height but does limit the FAR to 1.5:1. The "CDO" indicates the Project Site is located within the Downtown Westchester Community Design Overly (CDO) District, which provides design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, appearance and enjoyment of Downtown Westchester.

As discussed in detail in Section 3, Project Description, of this SCEA, the Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within a single eight-story building with a maximum height of 96 feet. Upon completion, the Project would result in a floor area ratio (FAR) of 4:1. The proposed residential and commercial uses would be consistent with the types of uses permitted in the C2 zone of the Project Site, as described above. Specifically, the area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including a myriad of commercial and residential uses. The surrounding properties are also generally zoned for C2 commercial use, consistent with the zoning of the Project Site. As such, the proposed uses would not degrade the existing visual character or quality of the area. With regard to height, as described above, the zoning of the Project Site does not establish a height maximum but rather permits a maximum FAR of 1.5:1. While the existing zoning does not establish a maximum height limit, the Project would exceed the permitted FAR of 1.5:1. As part of the Project, a FAR increase is included to permit the Project FAR. As previously described, the area surrounding the Project Site is highly urbanized and

[22] *Caltrans, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed May 9, 2024.*

includes a mix of low- to mid-rise buildings containing a variety of uses. The proposed buildings would be an extension of the existing types of buildings already in the area and would not introduce a new visual feature that would be out of character for the area and overall Westchester–Playa del Rey Community Plan area. Therefore, the proposed building and height would not conflict with the existing visual character of the area surrounding the Project Site.

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 Westchester–Playa del Rey Community Plan (Community Plan), the Downtown Westchester Community Design Overly (CDO), Citywide Design Guidelines. These plans, policies, and regulations are discussed in more detail below.

### General Plan Framework Element

The Framework Element provides direction regarding the City's vision for future development in the City. 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, 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 also outlined in Table 4 on page 63.

As described in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. The area surrounding the Project Site includes a mix of low to mid-rise commercial and residential uses. The Project would enhance the built environment in the surrounding area and upgrade the quality of development by replacing the existing uses with a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space that would incorporate design elements that would enhance the quality of the visual environment. The building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. The Project would be stepped back along the La Tijera Boulevard frontage and would feature roof decks at alternating floors along the intersection of La Tijera Boulevard and Truxton Avenue, and a roof deck at the corner of Manchester Avenue and Truxton Avenue. The height of the new building would fit in with the context of the taller buildings along Manchester Avenue and would serve as a gateway project into the Westchester Town Center. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade and activate the building's elevation at the upper floor levels. Overall, the Project would provide a cohesive visual identity for the Project Site and would further develop the character of this community center. The architectural design would be responsive to the surrounding buildings and activate the street frontages along Truxton Avenue, Manchester Avenue, and La Tijera Boulevard.

**Table 4**
**Applicable Goals, Objectives, and Policies of the General Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| ***General Plan Framework Element Land Use Chapter (Chapter 3)*** | |
| **Policy 3.7.4:** Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element. | **No Conflict.** The Project would replace the existing commercial uses and surface parking areas on the Project Site with a new mixed-use development consisting of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within a single eight-story building that would be designed to unify and enhance the overall aesthetic environment of the Project Site and surrounding area. Furthermore, various open space areas, including a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site would also serve to improve the overall visual quality of the Project Site. As provided below, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter of the General Plan Framework Element as well as the Urban Design Chapter of the Community Plan. Therefore, the Project would not conflict with this policy. |
| ***General Plan Framework Element Housing Chapter (Chapter 4)*** | |
| **Objective 4.3:** Conserve scale and character of residential neighborhoods. | **No Conflict.** The Project Site vicinity includes a mix of low- to mid-rise commercial and residential uses to be developed within an existing commercial neighborhood. 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 surrounding uses and respond to the low- to mid-scale character of the surrounding area. Specifically, the building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. The Project would be stepped back along the La Tijera Boulevard frontage and would feature roof decks at alternating floors along the intersection of La Tijera Boulevard and Truxton Avenue, and a roof deck at the corner of Manchester Avenue and Truxton Avenue. The height of the new building would fit in with the context of the taller buildings along Manchester Avenue, and would serve as a gateway project into the Westchester Town Center. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade |

**Table 4 (Continued)**
**Applicable Goals, Objectives, and Policies of the General Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | and activate the building's elevation at the upper floor levels. Overall, the Project would provide a cohesive visual identity for the Project Site and would further develop the character of this community center. The architectural design would be responsive to the surrounding buildings and would activate the street frontages along Truxton Avenue, Manchester Avenue, and La Tijera Boulevard. Therefore, the Project would not conflict with this objective. |
| ***General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)*** | |
| **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.** As described above, the Project would replace the existing commercial uses and surface parking area with a new mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The Project would contribute to the quality of the public realm by providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment and improving the quality of the public realm. Additionally, the Project would enhance the street frontages with attractive landscaping and would include pedestrian amenities and street activating uses such as outdoor dining. Overall, the Project would be designed to complement and enhance the surrounding area. Therefore, the Project would not conflict with this objective. |
| **Objective 5.8:** Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community. | **No Conflict.** While this is a citywide objective, the Project would support its implementation. The Project would create a pedestrian friendly environment by creating a street-level identity along Truxton Avenue by providing a 2,345-square-foot plaza. The plaza would complement the commercial uses at the ground level and integrate the Project with the surrounding community. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. The Project would also provide new street trees along the perimeter of the Project Site, further enhancing the pedestrian environment. Furthermore, the Project would include pedestrian-scale lighting fixtures and elements. Therefore, the Project would not conflict with this objective. |
| **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 be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage that would comply with LAMC regulations and the provisions of the CDO, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical |

**Table 4 (Continued)**
**Applicable Goals, Objectives, and Policies of the General Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Therefore, the Project would not conflict with this policy. |
| **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.** While this is a citywide objective, the Project would support its implementation. The Project would include project design features, as outlined under Item XV.a. of this SCEA, that would increase personal safety at all times of the day. These project design features include the use of security fencing, lighting, and locked entry during construction; the use of a closed-circuit camera system and keycard for entry into residential uses and residential parking; the provision of proper lighting of the buildings, walkways, and subterranean parking areas; and entrances, exits, and open space areas that are designed to be open and in view of surrounding areas. Therefore, the Project would not conflict with this objective. |
| ***General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)*** | |
| **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 include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site 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. All exterior and interior lighting would meet high energy efficiency requirements utilizing LED or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations. Therefore, the Project would not conflict with this goal. |
| **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. Therefore, the Project would not conflict with this objective. |
| **Policy 9.40.1:** Require lighting on private streets, pedestrian oriented areas, and | **No Conflict.** Refer to the discussion for Goal 9P above. Lighting on pedestrian oriented areas and pedestrian walks |

**Table 4 (Continued)**
**Applicable Goals, Objectives, and Policies of the General Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| pedestrian walks to meet minimum City standards for street and sidewalk lighting. | would comply with existing applicable energy standards and would maintain the existing and appropriate light levels currently utilized on and off-site which meet City standards for street and sidewalk lighting. Therefore, the Project would not conflict with this policy. |
| **Policy 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. Therefore, the Project would not conflict with this policy. |
| **Policy 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. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site 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. All exterior and interior lighting would meet high energy efficiency requirements utilizing LED or efficient fluorescent lighting technology. Therefore, the Project would not conflict with this policy. |
| ***General Plan Conservation Element (Section 15)*** | |
| **Objective:** Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations. | **No Conflict.** The Project is located in an urban area with relatively flat terrain and built out surroundings. Therefore, publicly available views of any valued visual resources in the vicinity of the Project Site would be maintained. Therefore, the Project would not obstruct or remove access to natural and scenic vistas and would not conflict with this objective. |

*Project consistency with additional Framework Element goals, objectives, and policies is analyzed under Item XI, Land Use and Planning.*

*Source: Eyestone Environmental, 2024.*

Additionally, the Project would contribute to the quality of the public realm by providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment and improving the quality of the public realm. The Project would further enhance the street frontages with attractive landscaping and would include pedestrian amenities and street activating uses such as outdoor dining. Overall, the Project would be designed to complement and enhance the surrounding area.

The Project would also support the Framework Element's goals, policies and objectives related to lighting. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all applicable LAMC requirements, including those applicable to projects within the Downtown Westchester CDO District. In addition, any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulation and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sideways and roadways while minimizing light and glare on adjacent streets.

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 as detailed above.

### Westchester–Playa del Rey Community Plan

As it relates to scenic quality, the Westchester–Playa del Rey Community Plan includes the following objective:

- Objective 1-6: Preserve visual resources in residential areas.

As previously discussed, the area surrounding the Project Site is primarily developed with a mix of low- to mid-rise commercial and residential uses. Valued visual resources in the vicinity of the Project Site include historical resources such as structures within the Historic District to the west across Truxton Avenue. However, as previously discussed above, the Project would be constructed within the existing Project Site boundaries and existing views of the Historic District and associated structures along Truxton Avenue would remain. Thus, the Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Community Plan regarding scenic quality.

#### Downtown Westchester Community Design Overlay District

The Downtown Westchester CDO District covers properties primarily fronting Sepulveda Boulevard and Manchester Avenue and also including frontage on Sepulveda Westway, Sepulveda Eastway, La Tijera Boulevard, and 87th Street. The intent of the CDO is to provide design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, appearance and enjoyment of Downtown Westchester. The CDO ensures that development within the Downtown Westchester area reflects the overall vision of a cohesive, pedestrian-friendly and vibrant commercial district. The Project's general consistency with the applicable purposes related to aesthetics is outlined in Table 5 on page 68. As discussed in detail therein, the Project would be designed in accordance with the spirit and intent of the Downtown Westchester CDO District. The building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades.

**Table 5**
**Applicable Design Principles of the Downtown Westchester CDO District**

| Principle/Guideline | Analysis of Project Consistency |
|---|---|
| ***Design Principles*** | |
| **Compatibility:** The Downtown Westchester area features a mixture of development types, including: traditional commercial buildings; office buildings; restaurant and auto-oriented uses such as parking structures; car rental lots; and auto repair facilities. The design of such structures is influenced by use, development requirements, lot size, access, and unique site constraints. Within the context of these limitations, new development should maintain a basic consistency and compatibility within and between development projects, which can be achieved through consideration of setbacks, façade articulation, landscaping, and sign programs. | **No Conflict.** The Project would be designed in accordance with the spirit and intent of the Downtown Westchester CDO District. Specifically, the building uses a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project would feature a contemporary architectural style that includes architectural elements already found on the Project Site and in the surrounding neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. The new building would be designed to complement adjacent structures through the utilization of similar massing and material cues. Additionally, landscaping and signage would be compatible with the surrounding area. Therefore, the Project would not conflict with this design principle. |
| ***Guidelines—Site Planning*** | |
| **Guideline 1:** Encourage an inviting pedestrian environment and provide for streetwall continuity by locating buildings so they front the main commercial street, and encourage active public uses, such as additional street trees, outdoor seating, kiosks, forecourts and arcades. | **No Conflict.** The proposed uses would be oriented towards Truxton Avenue and La Tijera Boulevard and would be designed with ground floor commercial spaces. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. The Project would also encourage active public uses by providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. Furthermore, the Project would provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. Therefore, the Project would not conflict with this guideline. |
| **Guideline 2:** Improve streetwall continuity and encourage a safe and inviting pedestrian environment by locating parking away from the streetwall and minimizing direct driveway access from major streets. Design parking facilities that do not depreciate the visual quality of the downtown. | **No Conflict.** As discussed in Section 3, Project Description of this SCEA, parking would be located within two subterranean levels and in Levels 1 and 2 of the proposed building, which would be wrapped in active uses (residential or commercial) and landscaping. No above-grade parking would be visible from any public street or surrounding properties and no freestanding parking structures are proposed. Additionally, no new curb cuts are proposed along Manchester Avenue. Furthermore, the Project would include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the commercial and residential uses. Therefore, the Project would not conflict with this guideline. |

**Table 5 (Continued)**
**Applicable Design Principles of the Downtown Westchester CDO District**

| Principle/Guideline | Analysis of Project Consistency |
|---|---|
| ***Guidelines—Architectural Detailing and Articulation*** | |
| **Guideline 3:** Heighten visual interest and enhance pedestrian orientation by incorporating three-dimensional elements and material variation into the ground-floor façade of buildings. These elements and variations include: changes in building materials, texture and color; generously sized transparent display windows; arcades, canopies, and awnings; cornices; other details such as transom windows and overdoors. | **No Conflict.** The ground floor would be designed as a combination of commercial spaces, live/work residential units, and lobby space, which are all proposed to have continuous storefront systems. The proposed storefronts would contain transparent, non-reflective glazing with sills located at the finish floor. The proposed design employs a variety of elements to break down the building façade. At the ground level a rhythm of pilasters, material changes and landscaping would be incorporated. Additionally, the building façade above the ground level would feature undulating massing breakdown that includes indentations, openings, terracing, and material changes. Therefore, the Project would not conflict with this guideline. |
| **Guideline 4:** Provide visual interest and enhance the public realm by employing rhythmic, three-dimensional variations in massing and building form, including the use of recessed windows, towers, columns, cornices, and changes in the wall plane. Minimize building mass impacts on adjacent residential neighborhoods by allowing for ventilation, light, and privacy. | **No Conflict.** The scale, massing, and location of the Project would respond to the unique shape of the Project Site and the surrounding urban context. The proposed design employs a variety of elements to break down the building façade. At the ground level a rhythm of pilasters, material changes, and landscaping has been incorporated. The building façade above the ground level incorporates undulating massing breakdown that includes protrusions, recesses, and material changes. As previously discussed, the Project is stepped back and places the majority of its mass along Truxton Avenue and Manchester Avenue. As such, the new building would not adversely impact the single-family neighborhood across La Tijera Boulevard. Therefore, the Project would not conflict with this guideline. |
| **Guideline 7:** Emphasize pedestrian orientation and accessibility by creating well-articulated and inviting building entrances, and by orienting these entrances towards the primary street. | **No Conflict.** The proposed uses would be oriented towards Truxton Avenue and La Tijera Boulevard and would be designed with ground floor commercial spaces. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. Therefore, the Project would not conflict with this guideline. |
| **Guideline 8:** Provide parking opportunities that are simultaneously convenient and enhance and protect the visual integrity of the boulevard. Architecturally integrate parking structures into the design of the projects that they serve, and activate the street by including commercial uses on the ground level of structures. Protect nearby residents from the potential adverse impacts—noise, visual, or otherwise—from parking structures and their use | **No Conflict.** As discussed in Section 3, Project Description of this SCEA, parking would be located within two subterranean levels and in Levels 1 and 2 of the proposed building, which would be wrapped in active uses (residential or commercial) and landscaping, thereby protecting the visual integrity of the street frontages and protecting nearby residents from noise generated by vehicles visiting the Project Site. Furthermore, as previously discussed, the Project would activate the ground-floor along the street frontages by introducing new ground-floor commercial space. Therefore, the Project would not conflict with this guideline. |
| ***Guidelines—Appurtenances*** | |
| **Guideline 11:** Improve the pedestrian environment along the sidewalk and minimize visual blight by screening unsightly equipment | **No Conflict.** Utilities, storage areas, trash containers, air conditioning units, fire alarms, and similar equipment would be buffered from view within the building structure, or have |

**Table 5 (Continued)**
**Applicable Design Principles of the Downtown Westchester CDO District**

| Principle/Guideline | Analysis of Project Consistency |
|---|---|
| and locating it away from public streets and other public rights-of-way, including pedestrian walkways and parking areas. | been screened from view so as to be undetectable from outside the building. Therefore, the Project would not conflict with this guideline. |
| ***Guidelines—Landscaping and Hardscape*** | |
| **Guideline 13:** Create inviting spaces, provide shade within the public realm, screen unattractive areas, and enhance architectural detailing through the thoughtful and careful placement of landscaping. Pedestrian plazas, green space, pocket parks and open space shall be encouraged. | **No Conflict.** The Project would contribute to the quality of the public realm by providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment and improving the quality of the public realm. Additionally, the Project would enhance the street frontages with attractive landscaping and would include pedestrian amenities and street activating uses such as outdoor dining. Furthermore, the Project would provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. Therefore, the Project would not conflict with this guideline. |
| ***Guidelines—Signage*** | |
| **Guideline 15:** Promote the identity and success of individual businesses while enhancing the visual quality of the Boulevard, through context-sensitive signs. Ensure that signage design is suitable in terms of location, layout, and styling. Minimize sign clutter and emphasize pedestrian-scale design.<br><br>**Guideline 19:** Promote the identity and success of individual businesses while enhancing the visual quality of the Downtown, through the appropriate placement, size, and quantity of additional signage. | **No Conflict.** Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations and the provisions of the CDO District, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Therefore, the Project would not conflict with this guideline. |
| ***Guidelines—Resource Protection*** | |
| **Guideline 22:** Design projects to take advantage of natural systems and features—breezes, daylight, tree canopies—and to minimize the need for artificial lighting, cooling, and heating. Incorporate sustainable building elements into the overall form and aesthetic of projects. | **No Conflict.** The Project's design is based on smart growth principles and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. Additionally, the Project would incorporate environmentally sustainable design features required by the Los Angeles Green Building Code and would achieve LEED Silver equivalency. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Furthermore, the Project would |

**Table 5 (Continued)**
**Applicable Design Principles of the Downtown Westchester CDO District**

| Principle/Guideline | Analysis of Project Consistency |
|---|---|
| | incorporate additional sustainable features including high efficiency plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and water-efficient landscape design. The Project would also comply with the City's EV charging requirements. In addition, the new residential units would be equipped with high efficiency toilets and low-flow showerheads. Therefore, the Project would not conflict with this guideline. |

*Source: Eyestone Environmental, 2024.*

Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. The Project would be stepped back along the La Tijera Boulevard frontage and would feature roof decks at alternating floors along the intersection of La Tijera Boulevard and Truxton Avenue, and a roof deck at the corner of Manchester Avenue and Truxton Avenue. The height of the new building would fit in with the context of the taller buildings along Manchester Avenue and would serve as a gateway project into the Westchester Town Center. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade and activate the building's elevation at the upper floor levels. Overall, the design, scale, and location of the Project would respond to the intent of the CDO and the surrounding urban context. The Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Downtown Westchester CDO.

### Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

*Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.*

The Project would enhance the pedestrian experience adjacent to and within the Project Site by incorporating a design that would provide a safe, comfortable, and accessible environment. Specifically, the Project ground-floor commercial spaces would be designed to be highly visually permeable with floor to ceiling windows and transparent materials, thereby creating a pedestrian-friendly environment and activating the streetscape. In addition, the Project would install landscaping, including new trees as well as providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the

surrounding community. Access points would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would also comply with Americans with Disabilities Act (ADA) requirements. Furthermore, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all. Therefore, the Project would support this guideline.

*Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.*

Existing vehicular access to the Project Site is primarily provided via Truxton Avenue, Manchester Avenue, and La Tijera Boulevard. The Project would reduce the overall number of vehicular driveways and potential conflicts by providing one full-access driveway on Truxton Avenue and one full-access driveway on La Tijera Boulevard. The two existing driveways on Manchester Avenue would be removed and the two existing driveways on La Tijera Boulevard would be consolidated into one driveway. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access . Therefore, the Project would support this guideline.

*Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.*

The building uses a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. As previously discussed, the Project would activate the ground-floor along the street frontages by introducing new ground-floor commercial space, which would be designed to be highly visually permeable, thereby activating the streetscape. In addition, the Project would install landscaping, including new trees as well as providing a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale. Therefore, the Project would support this guideline.

*Guideline 4: Organize and shape projects to recognize and respect surrounding context.*

As previously discussed, the Project Site is located within the Westchester–Playa Del Rey Community Plan and the Downtown Westchester CDO District. The area surrounding the Project Site is predominantly developed with low to mid-rise commercial and residential uses.

As previously described above, the scale, massing and location of the Project will respond to the unique shape of the site and the surrounding urban context. The building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. As previously discussed, the Project is stepped back and places the majority if its mass along Truxton Avenue and Manchester Avenue. As such, the new building would

not adversely impact the single-family neighborhood across La Tijera Boulevard. Overall, the height of the new building would fit in with the context of the taller buildings along Manchester Avenue and would serve as a gateway project into the Westchester Town Center. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade and activate the building's elevation at the upper floor levels. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Therefore, the Project would support this guideline.

*Guideline 5: Express a clear and coherent architectural idea.*

In accordance with the spirit and intent of the Westchester–Playa Del Rey Community Plan and the Downtown Westchester CDO District, the building uses a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontages along Truxton Avenue and La Tijera Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. The proposed design employs a variety of elements to break down the building façade. At the ground level a rhythm of pilasters, material changes and landscaping would be incorporated. Additionally, the building façade above the ground level would feature undulating massing breakdown that includes indentations, openings, terracing, and material changes. The height of the new building would fit in with the context of the taller buildings along Manchester Avenue and would serve as a gateway project into the Westchester Town Center. Alternating grays and white would be used throughout each street frontage to accentuate the shape of the building and breaks in the plane would be provided throughout each frontage to complement the pedestrian entrances. Window openings and Level 8 patios punctuate the building's façade and activate the building's elevation at the upper floor levels. Overall, the Project design would express an active, pedestrian-friendly, compatible design that would complement the varying design elements of the uses adjacent to the Project Site. Therefore, the Project would support this guideline.

*Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.*

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by developing an active ground floor commercial space and installing extensive landscaping. The Project would also feature a publicly accessible 2,345-square-foot plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. The plaza would provide a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Therefore, the Project would support this guideline.

*Guideline 7: Carefully arrange design elements and uses to protect site users.*

As discussed in Section 3, Project Description, of this SCEA, parking would be provided within two subterranean levels and in Levels 1 and 2 of the proposed building, which would be wrapped in active uses (residential or commercial) and landscaping. The Project would reduce the overall number of vehicular driveways and potential conflicts by providing one full-access driveway on Truxton Avenue

and one full-access driveway on La Tijera Boulevard. The two (2) existing driveways on Manchester Avenue would be removed and the two (2) existing driveways on La Tijera Boulevard would be consolidated into one (1) driveway. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the commercial and residential uses. Therefore, the Project would support this guideline.

*Guideline 8: Protect the site's natural resources and features.*

The Project Site is located in an urbanized area and is developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. The Project Site contains limited to sparse landscaping in the form of nonnative/non protected trees, hedges, and shrubs. As discussed further below, the Project would remove a total of 45 trees located on the Project Site and two (2) trees located on the surrounding sidewalks (City street trees), none of which are considered protected species by the City.[23] The Project would provide 79 new on-site trees on the ground floor and on various building levels and would replace the removed street trees in compliance with the City's Urban Forestry Division standards and subject to approval by the Board of Public Works. Thus, the Project would support this guideline.

*Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.*

As discussed in Section 3, Project Description, of this SCEA, 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 CALGreen and would achieve LEED Silver equivalency. The Project's design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. "Green" features would include energy-efficient buildings, a pedestrian-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Thus, the Project would lower energy demand and increase the comfort and well-being of users through site layout, building massing, and orientation. Therefore, the Project would support this guideline.

*Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.*

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way.

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[23] *NOREAS, Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

In addition, the Project would incorporate drought tolerant landscaping throughout the Project Site. Therefore, the Project would support this guideline.

***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, Downtown Westchester CDO District, Citywide Design Guidelines. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no impacts would occur.***

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

**No Impact.** Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

**Construction**

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary, for a short duration while construction activities conclude for the day and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[24] Additionally, as part of the Project, construction lighting would

[24] *LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.*

be shielded to minimize the potential for light spillover to affect adjacent residential properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur, and impacts would be less than significant.

**Operation**

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site 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. All exterior and interior lighting would meet high energy efficiency requirements utilizing LED or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations and the provisions of the CDO, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during

the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

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. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no impacts would occur.***

**Cumulative Impacts**

**Less Than Significant Impact.** A cumulative analysis of aesthetics impacts includes the related projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses. As shown in Figure 18 on page 391 of this SCEA, only Related Project No. 3 is close enough to the Project Site to be considered in the cumulative analysis. Related Project No. 3 is located at 8540 South La Tijera Boulevard and involves the development of a 525-student middle school. Development of the Project along with Related Project No. 3 and the remaining six related projects would result in an overall incremental intensification of land uses in the vicinity of the Project Site. However, the Project and related projects, including Related Project No. 3, would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Furthermore, as described above, the Project would result in less than significant impacts regarding scenic vistas, visual character, and light and glare. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. ***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 FOREST RESOURCES

| | 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[25] that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

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

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

[25] *The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website.*

***Applicability to the Project***

As analyzed below, the Project would not convert farmland to a non-agricultural use, and therefore, Mitigation Measure PMM AG-1 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure PMM AG-2 from the 2020–2045 RTP/SCS PEIR 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 and is not near agricultural or forestry resources, and therefore, Mitigation Measure PMM AG-3 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure PMM AG-4 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure PMM AG-5 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 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) Provide permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential to mitigate for loss of farmland.

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 that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.

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

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

***Applicability to the Project***

As analyzed below, the Project would not convert farmland to a non-agricultural use; therefore, Mitigation Measure PMM AG-1 from the 2024–2050 RTP/SCS PEIR 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, Mitigation Measure PMM AG-2 from the 2024–2050 RTP/SCS PEIR 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 forest land 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 forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with forestry resources.

b) Acquire conservation easements for the loss of forestland.

c) Coordinate with responsible agencies including the United States Forest Service and Bureau of Land Management, as appropriate, regarding applicable requirements for transportation and urban land use projects within designated National Monuments in the SCAG region.

***Applicability to the Project***

The Project Site does not contain forest land; therefore, Mitigation Measure PMM AG-3 from the 2024–2050 RTP/SCS PEIR 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, Mitigation Measure PMM AG-4 from the 2024–2050 RTP/SCS PEIR 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, Mitigation Measure PMM AG-5 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

**a. Would the project 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.** The Project Site is located in an urbanized area of the City and is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). As discussed in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated parking. No agricultural uses or operations occur on-site or directly adjacent to the Project Site. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[26] ***Therefore, the Project would not convert farmland to a non-agricultural use, and no impact would occur.***

**b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** As discussed above, the Project Site is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). Pursuant to the LAMC, the C2 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. As such, the Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area.

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Project Site and surrounding area are also not enrolled under

[26] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011, accessed May 9, 2024.*

a Williamson Act Contract.[27] ***Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract, and no impact would occur.***

**c. Would the project 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.** As previously discussed, the Project Site is located in an urbanized area and is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land.[28] ***Therefore, 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. Would the project result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** The Project Site is zoned for commercial uses and is developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated parking. The Project Site is located in an urbanized area and is not used as 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. Would the project 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.** As described above, the Project Site is located within an urbanized area and there is no farmland or forest land on or near the Project Site. ***Therefore, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use, and no impact would occur***.

**Cumulative Impacts**

**No Impact.** The geographic context for a cumulative impact analysis on agriculture resources is the County of Los Angeles (County), and the geographic context for the cumulative analysis on forest resources is CAL FIRE's 19.9-million-acre South Coast area, which encompasses four national forests (Angeles, Cleveland, Los Padres, and San Bernardino) and other federal, state-, and privately-owned land. The Project and the related projects are located within a developed, urbanized area of the City generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related operations. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a

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[27] *California Department of Conservation, The Williamson Act Status Report 2020–2021.*

[28] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011, accessed May 9, 2024.*

non-agricultural use or result in the loss of forest land 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

| | 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 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 sponsors as appropriate and feasible:

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

– Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM

emissions by a minimum of 85%. 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***

Mitigation measure PMM AQ-1 from the 2020–2045 RTP/SCS PEIR MMRP includes multiple measures that are consistent with existing air quality regulatory requirements, as well as measures that exceed current regulatory requirements, such as PMM AQ-1(q), which requires Tier 4 Final equipment or better for all engines above 50 horsepower. However, as analyzed under Air Quality Threshold (b) below, air quality impacts with regard to the Project's short-term regional construction emissions would be less than significant without implementation of mitigation measures. Therefore, implementation of Mitigation Measure PMM-AQ-1(q) would not be necessary. Notwithstanding, the Project will implement Project Design Feature PDF-AIR-1 regarding the use of Tier 4 construction equipment. Furthermore, the remainder of the measures included in PMM AQ-1 are not applicable to the Project, as 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 remaining measures of PMM AQ-1 from the 2020–2045 RTP/SCS PEIR MMRP.

**SCAG 2024–2050 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 significant adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the lead agency:

a) Minimize land disturbance.

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

c) Cover trucks when hauling dirt.

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

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

f) Minimize unnecessary vehicular and machinery activities.

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

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

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

j) 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 [hp] 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.

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

l) Minimize idling time to 5 minutes—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 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.

p) Obtain CARB Portable Equipment Registration with the state or a local district permit for 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. Arrange appropriate consultations with CARB or the local air district to determine registration and permitting requirements prior to equipment operation at the site.

q) Use Tier 4 Final equipment or better for all engines above 50 hp. In the event that construction equipment cannot meet to Tier 4 Final or better engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the project's lead agency 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 Final or better engines would not be required to

mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible.

r) Projects located within the South Coast Air Basin and the Coachella Valley 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 identification of additional feasible mitigation that can be applied to individual projects.

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

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

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

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

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

  – Use ground service equipment (GSE) that can operate on battery-power. If using electric equipment is not feasible, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4 Final, at a minimum.

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

  – Develop specific timelines for transitioning to zero-emissions cargo handling equipment (CHE).

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

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

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

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

  – Encourage the participation in the Green Ship Incentives.

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

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

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

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

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

- Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
- Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
- Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
- Provide information to residents on where MERV filters can be purchased.
- Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
- Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
- Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
- Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a process for evaluating the effectiveness of the enhanced filtration units.

aa) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on the SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.

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

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

- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Nonroad diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- 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.
- 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.
- Maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
    i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
    ii. Any problems with the equipment or emission controls.
    iii. Certified copies of fuel deliveries for the time period that identify:
        1. Source of supply
        2. Quantity of fuel
        3. Quantity of fuel, including sulfur content (percent by weight)

cc) Promote energy efficiency and exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code):

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

- Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
- Install higher efficacy public street and area lighting
- Limit outdoor lighting requirements
- Replace traffic lights with LED traffic lights
- Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power
- Utilize a combined heat and power system.

dd) Promote transportation efficiency. The following measures can be used to increase transportation efficiency:

- 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.

ee) Lengthen the construction period during smog season (May through October) by extending the construction hours per workday or number of days worked per week, to minimize the number of vehicles and equipment operating at the same time.

ff) Install signage containing the complaint number of the local air district where construction activities are located at the construction sites.

***Applicability to the Project***

Mitigation measure PMM AQ-1 from the 2024–2050 RTP/SCS PEIR MMRP includes multiple measures that are consistent with existing air quality regulatory requirements, as well as measures that exceed current regulatory requirements, such as PMM AQ-1(q), which requires Tier 4 Final equipment or better for all engines above 50 horsepower. However, as analyzed under Air Quality Threshold (b) below, air quality impacts with regard to the Project's short-term regional construction emissions would be less than significant without implementation of mitigation measures. Therefore, implementation of Mitigation Measure PMM-AQ-1(q) would not be necessary. Notwithstanding, the Project will implement Project Design Feature PDF-AIR-1 regarding the use of Tier 4 construction equipment. Furthermore, the remainder of the measures included in PMM AQ-1 are not applicable to the Project, as 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 remaining measures of PMM AQ-1 from the 2024–2050 RTP/SCS PEIR MMRP.

**PMM AQ-2:** For projects subject to California Environmental Quality Act (CEQA) review (i.e., non-exempt projects) and located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and within one quarter mile (1,320 feet) of a sensitive land use, project leads, should prepare an air quality analysis that evaluates potential localized project air quality impacts in conformance with SCAQMD methodology for assessing localized significance thresholds (LST) air quality impacts. If air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the project should incorporate feasible mitigation measures to reduce air pollutant emissions.

***Applicability to the Project***

Consistent with Mitigation Measure PMM AQ-2 from the 2024–2050 RTP/SCS PEIR, potential localized air quality impacts were evaluated in conformance with SCAQMD's methodology for assessing localized significance thresholds (LST) air quality impacts. As analyzed below, the construction and operational emissions from the Project would not exceed any of SCAQMD's localized significance thresholds. As

no Project-specific impact related to localized emissions would occur, Mitigation Measure PMM AQ-2 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

**PMM AQ-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 other emissions (such as those leading to odors) adversely affecting a substantial number of people. Such measures may include the following or other comparable measures identified by the lead agency:

a) Implement an odor management plan that consistent with the requirements from the local air quality management district or air pollution control district.

b) Implement an odor control technique(s) or strategy(ies) consistent with the requirements from the local air quality management district or air pollution control district. Odor control techniques or strategies may include air filters, air scrubbers, enclosures, buzzer zones, physical barriers, housekeeping practices, or other techniques or strategies.

### *Applicability to the Project*

As discussed below, the Project would not create or result in other emissions, such as those leading to objectionable odors. As no Project-specific impact would occur, Mitigation Measure PMM AQ-3 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

## Impact Analysis

### a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Less Than Significant Impact.** The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [$O_3$]). SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

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.[29] With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under

[29] *SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.*

County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP.

The 2022 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in detail in Part 3, Project Description, of this SCEA, the Project would include a new mixed-use building on an approximately 2.4-acre site. The Project would include new residential and retail uses totaling 416,915 square feet. Specifically, the Project would provide 489 residential units, including 64 affordable housing units, and 16,120 square feet of retail uses.

As discussed under Item XIV, Population and Housing, below, it is expected that the Project would increase population and number of jobs by 1,159 residents and net new 19 employees. This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region. Furthermore, while the Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout, these would be short-term opportunities and are employment positions that circulate throughout the region based on the construction site. Therefore, because the Project would result in a minimal increase in population and permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS and which were used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. With regard to consistency with growth projections for the 2024–2050 RTP/SCS, as discussed below in Section XIV, Population and Housing, the Project would represent approximately 1.86 percent of the projected growth in the SCAG region between 2024 and 2029 (i.e., the Project's baseline and buildout years) and approximately 0.11 percent of the projected employment growth in the SCAG Region between 2024 and 2029. Therefore, the Project's contribution to population and employment growth would be also consistent with projections contained in the 2024–2050 RTP/SCS.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have

been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

As described in Part 3, Project Description, of this SCEA, the Project would add residential and commercial uses resulting in increases in population and employees. The Project's location within an existing urban area would reduce per capita vehicle miles traveled (VMT) and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further under Item XVII, Transportation, and in the Transportation Assessment included as Appendix K.1 of this SCEA (which includes the VMT Calculator run for the Project).[30] High population density would result in employees potentially living closer to the Project Site, reducing travel distances and overall VMT. The Project's 489 residential units, including the 64 affordable units, would provide the opportunity for area workers to live within close proximity to their place of employment. In addition, the Project includes short and long term bicycle parking spaces for the proposed uses, would be developed in an urban area within close proximity to residential uses, and would include on-site EV and EV-ready parking, thereby facilitating a reduction in VMT as discussed under Item XVII and the Transportation Assessment. The Project would also include primary entrances for pedestrians and bicyclists that would be safe and easily accessible. As part of the Project, bicycle racks (i.e., 28 short-term and 206 long-term) would be installed, thereby further promoting the use of an alternative mode of transportation.

As shown in Table 6 through Table 11 on pages 101 through 106, respectively, in the analysis below, Project implementation would not exceed California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$), the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

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[30] *Gibson Transportation Consultants, Inc., Transportation Assessment for the 6136 Manchester Avenue Residential Project, Los Angeles, California, December 2022, revised August 2024. See Appendix K.1 of this SCEA.*

**Table 6**
**Winter Regional and Localized Unmitigated Construction Emissions[a]**
**(pounds per day)**

| Emission Type | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$[c] | $PM_{2.5}$[c] |
|---|---|---|---|---|---|---|
| **Regional Emissions** | | | | | | |
| 2026 | 3 | 56 | 51 | <1 | 9 | 3 |
| 2027 | 3 | 21 | 33 | <1 | 2 | 1 |
| 2028 | 32 | 18 | 26 | <1 | 2 | 1 |
| 2029 | 34 | 9 | 11 | <1 | 1 | <1 |
| Maximum Regional Emissions | 34 | 56 | 51 | <1 | 9 | 3 |
| **Regional Construction Daily Significance Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | **(41)** | **(44)** | **(499)** | **(150)** | **(141)** | **(52)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Localized Emissions** | | | | | | |
| 2026 | — | 25 | 36 | — | 1 | <1 |
| 2027 | — | 19 | 28 | — | <1 | <1 |
| 2028 | — | 16 | 20 | — | <1 | <1 |
| 2029 | | 8 | 10 | | <1 | <1 |
| Maximum Localized Emissions | — | 25 | 36 | — | 1 | <1 |
| **Localized Significance Threshold[d]** | **—** | **124** | **1,067** | **—** | **9** | **5** |
| **Over/(Under) Threshold** | **—** | **(99)** | **(1,031)** | **—** | **(8)** | **(4)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix B of this SCEA. CalEEMod modeling outputs are also provided in Appendix B.2 of this SCEA. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *$PM_{10}$ and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet north of the Project Site). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP, and impacts would be less than significant.**

**Table 7**
**Summer Regional and Localized Unmitigated Construction Emissions[a]**
**(pounds per day)**

| Emission Type | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$[c] | $PM_{2.5}$[c] |
|---|---|---|---|---|---|---|
| **Regional Emissions** | | | | | | |
| 2026 | 3 | 55 | 52 | <1 | 9 | 3 |
| 2027 | 3 | 21 | 33 | <1 | 2 | 1 |
| 2028 | 2 | 17 | 26 | <1 | 2 | 1 |
| Maximum Regional Emissions | 3 | 55 | 52 | <1 | 9 | 3 |
| **Regional Construction Daily Significance Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | **(72)** | **(45)** | **(498)** | **(150)** | **(141)** | **(52)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Localized Emissions** | | | | | | |
| 2026 | — | 25 | 36 | — | 1 | <1 |
| 2027 | — | 19 | 28 | — | <1 | <1 |
| 2028 | — | 16 | 20 | — | <1 | <1 |
| Maximum Localized Emissions | — | 25 | 36 | — | 1 | <1 |
| **Localized Significance Threshold[d]** | **—** | **124** | **1,067** | **—** | **9** | **5** |
| **Over/(Under) Threshold** | **—** | **(99)** | **(1,031)** | **—** | **(7)** | **(4)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix B of this SCEA. CalEEMod modeling outputs are also provided in Appendix B.2 of this SCEA. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *$PM_{10}$ and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet north of the Project Site). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**Table 8**
**Winter Regional and Localized Construction Emissions with PDFs[a]**
**(pounds per day)**

| Emission Type | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$[c] | $PM_{2.5}$[c] |
|---|---|---|---|---|---|---|
| **Regional Emissions** | | | | | | |
| 2026 | 2 | 39 | 58 | <1 | 9 | 3 |
| 2027 | 1 | 9 | 38 | <1 | 2 | 1 |
| 2028 | 32 | 8 | 30 | <1 | 2 | 1 |
| 2029 | 34 | 5 | 16 | <1 | 1 | <1 |
| Maximum Regional Emissions | 34 | 39 | 58 | <1 | 9 | 3 |
| **Regional Construction Daily Significance Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | **(41)** | **(61)** | **(492)** | **(150)** | **(141)** | **(52)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Localized Emissions** | | | | | | |
| 2026 | — | 9 | 43 | — | <1 | <1 |
| 2027 | — | 7 | 34 | — | <1 | <1 |
| 2028 | — | 7 | 24 | — | <1 | <1 |
| 2029 | | 4 | 15 | | <1 | <1 |
| Maximum Localized Emissions | — | 9 | 43 | — | 1 | <1 |
| **Localized Significance Threshold[d]** | **—** | **124** | **1,067** | **—** | **9** | **5** |
| **Over/(Under) Threshold** | **—** | **(115)** | **(1,025)** | **—** | **(8)** | **(4)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix B of this SCEA. CalEEMod modeling outputs are also provided in Appendix B.2 of this SCEA. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *$PM_{10}$ and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet north of the Project Site). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**Table 9**
**Summer Regional and Localized Construction Emissions with PDFs[a]**
**(pounds per day)**

| Emission Type | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$[c] | $PM_{2.5}$[c] |
|---|---|---|---|---|---|---|
| **Regional Emissions** | | | | | | |
| 2026 | 2 | 38 | 58 | <1 | 9 | 3 |
| 2027 | 1 | 9 | 39 | <1 | 2 | <1 |
| 2028 | <1 | 8 | 31 | <1 | 2 | <1 |
| Maximum Regional Emissions | 2 | 55 | 52 | <1 | 9 | 3 |
| **Regional Construction Daily Significance Threshold** | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | **(73)** | **(45)** | **(498)** | **(150)** | **(141)** | **(52)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Localized Emissions** | | | | | | |
| 2026 | — | 25 | 36 | — | 1 | <1 |
| 2027 | — | 19 | 28 | — | <1 | <1 |
| 2028 | — | 16 | 20 | — | <1 | <1 |
| Maximum Localized Emissions | — | 25 | 36 | — | 1 | <1 |
| **Localized Significance Threshold[d]** | — | **124** | **1,067** | — | **9** | **5** |
| **Over/(Under) Threshold** | — | **(99)** | **(1,031)** | — | **(7)** | **(4)** |
| **Exceed Threshold?** | — | **No** | **No** | — | **No** | **No** |

[a] *Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix B of this SCEA. CalEEMod modeling outputs are also provided in Appendix B.2 of this SCEA. Numbers may not add up exactly due to rounding.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *$PM_{10}$ and $PM_{2.5}$ emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet north of the Project Site). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**Table 10**
**Winter Project-Related Operational Emissions[a]**
**(pounds per day)**

| Emission Type/Source | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| **Operational Emissions** | | | | | | |
| Area | 9 | <1 | <1 | <1 | <1 | <1 |
| Energy (Natural Gas) | -<1 | -<1 | -<1 | -<1 | -<1 | -<1 |
| Mobile | 7 | 5 | 53 | <1 | 14 | 4 |
| Stationary (Emergency Generator) | <1 | <1 | 1 | <1 | <1 | <1 |
| **Project Regional Emissions** | **17** | **5** | **54** | **<1** | **14** | **4** |
| Regional Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Over/(Under)** | **(38)** | **(50)** | **(496)** | **(150)** | **(136)** | **(51)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Project Localized Emissions[c] | — | <1 | 1 | — | <1 | <1 |
| **Localized Significance Threshold[d]** | **—** | **124** | **1,067** | | **2** | **1** |
| **Over/(Under) Threshold** | **—** | **(124)** | **(1,066)** | | **(2)** | **(1)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

*Note: Numbers may not add up exactly due to rounding*

[a] *Worksheets and modeling output files are provided in Appendix B.2 of this SCEA.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet) north of the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**Table 11**
**Summer Project-Related Operational Emissions[a]**
**(pounds per day)**

| Emission Type/Source | VOC[b] | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|---|---|
| **Operational Emissions** | | | | | | |
| Area | 13 | <1 | 34 | <1 | <1 | <1 |
| Energy (Natural Gas) | -<1 | -<1 | -<1 | -<1 | -<1 | -<1 |
| Mobile | 7 | 5 | 57 | <1 | 14 | 4 |
| Stationary (Emergency Generator) | <1 | <1 | 1 | <1 | <1 | <1 |
| **Project Regional Emissions** | **21** | **5** | **93** | **<1** | **14** | **4** |
| Regional Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Over/(Under)** | **(34)** | **(50)** | **(457)** | **(150)** | **(136)** | **(51)** |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Project Localized Emissions[c] | — | 1 | 36 | — | <1 | <1 |
| **Localized Significance Threshold[d]** | **—** | **124** | **1,067** | | **2** | **1** |
| **Over/(Under) Threshold** | **—** | **(124)** | **(1,032)** | | **(2)** | **(1)** |
| **Exceed Threshold?** | **—** | **No** | **No** | **—** | **No** | **No** |

*Note: Numbers may not add up exactly due to rounding*

[a] *Worksheets and modeling output files are provided in Appendix B.2 of this SCEA.*

[b] *CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.*

[c] *Localized emissions include area, energy and stationary sources.*

[d] *The SCAQMD LSTs are based on Source Receptor Area No. 3 (Southwest Los Angeles County Coastal) for a 2.4-acre site with a 25-meter receptor distance (closest receptor distance included in SCAQMD LSTs). The closest sensitive receptor is located approximately 33 meters (110 feet) north of the Project Site. Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008.*

*Source: Eyestone Environmental, August 2024; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.*

**b. Would the project 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.** As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The monitoring station most representative of the Project Site is the LAX Hastings Station, located at 7201 West Westchester Parkway in the City of Los Angeles, approximately 1.5 miles south of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts

relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.[31]

## Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading, and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides ($NO_X$), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for $NO_X$; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides ($SO_X$); (5) 150 pounds per day for $PM_{10}$; and (6) 55 pounds per day for $PM_{2.5}$.[32]

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 30-month period (e.g., approximately early August 2026 through late January 2029). Construction would require approximately 79,244 cubic yards of total soil export. Details are provided in Appendix B of this SCEA. Furthermore, the Project would implement PDF -AIR-1 regarding the utilization of Tier 4 construction equipment, which would further reduce potential particulate emissions during Project construction.

### Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2022.1. Model results are provided in Appendix B.2 of this SCEA. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 6 and Table 7 on pages 101 and 102, along with the regional significance thresholds for each air pollutant. As shown in Table 6 and Table 7, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NOx, CO, $SO_X$, $PM_{10}$, or $PM_{2.5}$. As a

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[31] *SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html, accessed August 30, 2024.*

[32] *SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed August 30, 2024.*

result, regional construction emissions resulting from the Project would result in a less than significant impact, and no mitigation measures are required.

### Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.[33] SCAQMD provides LSTs applicable to the following criteria pollutants: $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$. SCAQMD does not provide an LST for $SO_2$ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in $O_3$ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate lookup tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. As the Project Site is 2.4-acres an interpolation between the 2-acre and 5-acre LSTs were used.

Estimates of maximum construction-related localized (on-site) daily emissions for $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$ are presented in Table 6 and Table 7 on pages 101 and 102. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST lookup tables and are also listed in Table 6 and Table 7. The nearest residential uses are residential uses located north and east of the Project Site, approximately 110 feet to the north and east. As a conservative measure, a 25-meter (83-foot) receptor distance was used to evaluate impacts at these receptors.[34] As presented in Table 6 and Table 7, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

## Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation and VMT analysis included in the Transportation

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[33] *SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.*

[34] *SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.*

Assessment, included as Appendix K.1 of this SCEA. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

### Regional Impacts

The results of the modeled emissions calculations are provided in Table 10 and Table 11 on pages 105 and 106, and CalEEMod model output files are provided in Appendix B.2 of this SCEA. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

### Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 10 and Table 11 on pages 105 and 106. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table 10 and Table 11, on-site localized operational emissions would not exceed any of the LSTs for $NO_X$, CO, $PM_{10}$, or $PM_{2.5}$.

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards.[35] No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Air quality data from the SCAQMD LAX Hastings monitoring station between years 2021-2023 indicate that the maximum CO levels in recent years are 1.7 ppm (1-hour average) and 1.5 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).[36]

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project-impacted intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections

[35] *SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed August 30, 2024.*

[36] *SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed August 30, 2024. LAX Hastings Monitoring Station.*

would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.[37] This intersection is located near the on and offramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 in Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.[38] The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[39] The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be LOS E at peak morning traffic and LOS F at peak afternoon traffic.[40,41] As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot.

At buildout of the Project, the Project is projected to have a net increase of 3,300 daily trips as calculated by the City's VMT Calculator as discussed under Item XVII, Transportation, and the Transportation Assessment, included in Appendix K.1 of this SCEA. The addition of these trips to any of the nearest study intersections would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the Project does not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

***Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Thus, impacts would be less than significant, and no Project mitigation would be required.***

**c. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.** Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These

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[37] *SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.*

[38] *The 8-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.*

[39] *Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).*

[40] *The Metropolitan Transportation Authority measured traffic volumes and calculated the LOS for the intersection of Wilshire Blvd./Sepulveda Ave. which is a block west along Wilshire Blvd., still east of Interstate 405.*

[41] *Metropolitan Transportation Authority. 2004. Congestion Management Program for Los Angeles County. Exhibit 2-6 and Appendix A.*

population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive receptor with respect to air quality are residential uses located approximately 110 feet north and east of the Project Site.

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

***Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.***

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

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that

may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as it would include residential, retail, and restaurant uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

**Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant.**

**Project Design Features**

The Project would implement the following project design feature:

**AQ-PDF-1:** Prior to demolition, a Project representative shall make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 25 horsepower. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board (CARB) or SCAQMD operating permit shall be available on-site at the time of mobilization of each applicable unit of equipment to allow a Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the United States Environmental Protection Agency (USEPA) Tier 4 Final standards.

**Cumulative Impacts**

**Less Than Significant Impact.** According to SCAQMD, individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As discussed above, the Project's construction-related and operational air quality emissions would be less than significant. Therefore, the Project's contribution to cumulative air quality impacts due to air emissions would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD's CEQA Air Quality Handbook and SCAQMD's supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative TAC emission impacts during construction would be less than significant.

With respect to TAC emissions, neither the Project nor any of seven related projects (which are largely residential, retail/commercial, and institutional), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. However, the Project and related projects would be subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, the related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and thus, would not contribute to a cumulative impact.

In conclusion, during construction and operation, the Project's regional, localized, and TAC emissions would not be cumulatively considerable, and cumulative 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? | ☐ | ☒ | ☐ | ☐ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | ☐ | ☐ | ☒ | ☐ |
| 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*

As discussed below, the Project Site is fully developed and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area. However, the Project would result in the removal of existing trees from the Project Site, where migratory birds and other species (e.g., bats) could potentially nest or roost. Accordingly, as discussed below, and consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2020–2045 RTP/SCS PEIR and in conformance with the regulatory requirements of the

Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement Mitigation Measure MM-BIO-1, which would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. In addition, the Project would incorporate relevant measures from Mitigation Measure PMM BIO-1 from the 2020–2045 RTP/SCS PEIR, as detailed below, which would be applicable to protected species that are not covered under existing regulatory measures (e.g., bats). Specifically, the Project would incorporate Mitigation Measure PMM BIO-1(g) and Mitigation Measure PMM BIO-1(i) from the 2020–2045 RTP/SCS PEIR, which would address potential impacts to other species that could potentially be affected due to the removal of the existing trees, and ensure that potential impacts would be reduced to less than significant levels. The remainder of the measures included in Mitigation Measure PMM BIO-1 from the 2020–2045 RTP/SCS PEIR are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

**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 from the 2020–2045 RTP/SCS PEIR 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. Therefore, the measures included in Mitigation Measure PMM BIO-3 from the 2020–2045 RTP/SCS PEIR 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 MM-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 above, consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2020–2045 RTP/SCS PEIR, the Project would implement Mitigation Measure MM-BIO-1, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Moreover, due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, all other components of Mitigation Measure PMM BIO-4 from the 2020–2045 RTP/SCS PEIR are 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 on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources

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

  – Avoidance strategies
  – Contribution of in-lieu fees
  – Planting of replacement trees
  – Re-landscaping areas with native vegetation post-construction
  – Other comparable measures developed in consultation with local agency and certified arborist.

***Applicability to the Project***

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Thus, Mitigation Measure PMM BIO-5 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure PMM BIO-6 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 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 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, and species that meet the definition of "rare" as defined in CEQA Guidelines Section 15380(b)(2). Such measures may include the following or other comparable measures identified by the lead agency:

a) Avoid occupied habitat and potentially suitable habitat for threatened, endangered, or rare species, as well as designated critical habitat in project design, wherever practicable and feasible.

Where projects are determined to contain 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, prior to construction, conduct preconstruction focused species surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. If sensitive plants or wildlife are present, identify and implement species-specific measures to avoid, minimize, and mitigate for potential impacts in consultation with USFWS or CDFW.

b) Where avoidance is determined to be infeasible for species protected under FESA, CESA, or local/regional species habitat conservation plan, provide conservation measures to result in no net loss of sensitive habitats and open space and 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) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings and may use alternatives to hydrocarbon-based asphalt paving to mitigate for potential hydrocarbon and heavy metal contamination.

### *Applicability to the Project*

As discussed below, the Project Site is fully developed and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area. However, the Project would result in the removal of existing

trees from the Project Site, where migratory birds and other species (e.g., bats) could potentially nest or roost. Accordingly, as discussed below, and consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2024–2050 RTP/SCS PEIR and in conformance with the regulatory requirements of the Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement Mitigation Measure MM-BIO-1, which would ensure that the Project would not have a substantial adverse effect on species covered under these regulations. In addition, the Project would incorporate relevant measures from Mitigation Measure PMM BIO-1 from the 2024–2050 RTP/SCS PEIR, as detailed below, which would be applicable to protected species that are not covered under existing regulatory measures (e.g., bats). Specifically, the Project would incorporate Mitigation Measure PMM BIO-1(g) and Mitigation Measure PMM BIO-1(i) from the 2024–2050 RTP/SCS PEIR, which would address potential impacts to other species that could potentially be affected due to the removal of the existing trees, and ensure that potential impacts would be reduced to less than significant levels. The remainder of the measures included in Mitigation Measure PMM BIO-1 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

**PMM BIO-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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. 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-bearing 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 biologist to monitor construction activities that may occur in or adjacent to sensitive communities.

j) Appoint a qualified 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 or regulatory specialist 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 to an adopted regional conservation plan.

n) Install temporary construction 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 ecologist/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 ecologist/biologist.

p) Revegetate with appropriate indigenous native vegetation following the completion of construction activities. as identified by the qualified ecologist/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 from the 2024–2050 RTP/SCS PEIR 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands. Such measures may include the following or other comparable measures identified by the lead agency.

a) Conduct an aquatic resources delineation by a qualified biologist or regulatory specialist to identify and map the extent of state and federally protected aquatic resources. Avoid state and federally protected aquatic resources in project design, consistent with the provisions of Sections 404 and 401 of the CWA and Section 1600 of Fish and Game Code, 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 of wetlands 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 or SAA by the CDFW. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with USACE's Final Compensatory Mitigation Rule or the CDFW SAA conditions. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as feasible. 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 rule establishes performance standards, sets timeframes for decision making, and to the maximum extent feasible, 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

d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, 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. Therefore, the measures included in Mitigation Measure PMM BIO-3 from the 2024–2050 RTP/SCS PEIR 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement. Such measures may include the following or other comparable measures identified by the lead agency:

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 Section 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 within 300 feet, or modified as appropriate by a qualified biologist, 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, minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors in project design.

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

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

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

m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities.

n) Install directional 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 temporal or permanent 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
   – Acquire contiguous adjacent land parcels to be protected in perpetuity from encroachment and development
   – Other comparable measures

p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact open space or wildlife nursery site areas that are not designated as such by federal, state, or local jurisdictions, 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.
- Direct architectural lighting 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.
- Provide structural and/or vegetative screening from light-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.
- 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) Include large buffers between sensitive uses and freeways.

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

w) To the extent practicable, avoid construction during dawn and dusk, when wildlife activity is highest.

y) If protected terrestrial wildlife enter work areas during construction, temporarily halt work to allow wildlife to move through the work area unharmed. A qualified biologist may relocate non-listed wildlife species out of the work area.

***Applicability to the Project***

As discussed above, consistent with Mitigation Measure PMM BIO-4(e) and (f) from the 2024–2050 RTP/SCS PEIR, the Project would implement Mitigation Measure MM-BIO-1, which would ensure that the Project would not interfere substantially with the movement of any migratory birds that may nest in the trees within and surrounding the Project Site. Moreover, due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, all other components of Mitigation Measure PMM BIO-4 from the 2024–2050 RTP/SCS PEIR are 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 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. 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 sourced native species, as directed by a qualified biologist.

d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas where trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to avoid 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) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees to occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials to be operated or stored within a distance from the base of any protected trees. Wires, ropes, or other devices not to 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, replace any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation or as determined by the local jurisdictions, 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, develop sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance, 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***

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Thus, Mitigation Measure PMM BIO-5 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

*The analysis of potential impacts associated with removal of trees is based in part on the 6136 Manchester Project–Arboricultural Inventory and Report (Tree Report), prepared by NOREAS and dated June 2023. This report is included as Appendix A of this SCEA.*

**a. Would the project 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 With Mitigation Incorporated.** The Project Site is located on previously disturbed, developed land. Specifically, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking areas. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs. As provided in the Tree Report, included as Appendix A of this SCEA, there are a total of 61 trees located within the Project Site and along the sidewalks surrounding the Project Site.[42] Of these, 45 trees would be removed, including 43 on-site trees and two off-site City street trees. The Project would provide 79 new on-site trees on the ground floor and on various building levels and would replace any removed street trees in compliance with the City's Urban Forestry Division standards and subject to approval by the Board of Public Works. 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." The Project would implement the following mitigation measure to ensure potential construction-related impacts on nesting birds would not occur:

**BIO-MM-1:** The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.

[42] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.

In addition to species covered under the Migratory Bird Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits "take" or possession of all nongame mammals or parts thereof. Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered "take" as defined in Section 86 of the California Fish and Game Code. While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities. Thus, construction activities could have a significant impact on bats, which are a protected species.

As discussed above, SCAG's 2020–2045 and 2024–2050 RTP/SCS PEIR MMRP contain mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measure PMM BIO-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, listed in detail above, which identifies measures to reduce substantial adverse effects related to threatened and endangered species and other special status species. As discussed above, the Project would implement Mitigation Measure BIO-MM-1 in order to avoid impacts to nesting birds, which would ensure that the Project would not have a substantial adverse effect on species covered under the Migratory Bird Treaty Act and the California Fish and Game Code. However, the Project would incorporate the following mitigation measures from the 2020–2045 and 2024–2050 RTP/SCS PEIR MMRPs to address protected species that are not covered under existing regulatory measures:

**2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(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.

**2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(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.

**2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(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.

**2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(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.

***Implementation of Mitigation Measure BIO-MM-1 as well as adherence to Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 and 2024–2050 RTP/SCS PEIR MMRPs outlined above, 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. Therefore, impacts would be less than significant with incorporation of mitigation measures.***

**b. Would the project 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?**

**Less Than Significant Impact.** The Project Site is located in an urbanized area and is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. The Project Site is surrounded by a mix of low to mid-rise commercial and residential uses. No riparian or other sensitive natural community identified by the CDFW or the USFWS exists on the Project Site or in the surrounding area.[43,44] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.[45,46] ***Therefore, 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 CDFW or USFWS, and impacts would be less than significant.***

**c. Would the project 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?**

**Less Than Significant Impact.** As discussed above, the Project Site is located in an urbanized area and is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. No water bodies or state and federally protected wetlands exist on the Project Site.[47] ***As such, the Project would not 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, and impacts would be less than significant.***

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[43] *CDFW, Biogeographic Information and Observation System (BIOS) https://apps.wildlife.ca.gov/bios6/, accessed May 15, 2024.*

[44] *USFWS, National Wetlands Inventory (NWI), www.fws.gov/wetlands/data/Mapper.html, accessed May 15, 2024.*

[45] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3.*

[46] *Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.*

[47] *United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed May 15, 2024.*

**d. Would the project 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 with Mitigation Incorporated.** As discussed above, the Project Site is located in an urbanized area and is developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. In addition, the areas surrounding the Project Site are fully developed 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 or County.[48,49]

As discussed in the Tree Report included in Appendix A of this SCEA, there are a total of 61 trees that were inventoried within and adjacent to the Project Site.[50] None of the 61 trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[51,52] Of these 61 trees, 45 trees would be removed, including 43 on-site trees and two off-site City street trees. 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 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, the Project would implement Mitigation Measure BIO-MM-1. ***Overall, implementation of Mitigation Measure BIO-MM-1 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 with incorporation of mitigation measures.***

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[48] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.*

[49] *Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.*

[50] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

[51] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

[52] *Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.*

**e. Would the project 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.** The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, adopted February 4, 2021) (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches in diameter at 4.5 feet above the ground level at the base of the tree or shrub.[53] These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees and shrubs that have been planted as part of a tree planting program are exempt from the Protected Tree and Shrub Ordinance and are not considered protected. The Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree or shrub, including "acts which inflict damage upon root systems or other parts of the tree or shrub…." The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, as determined by the Board of Public Works, or a licensed or certified arborist.

As previously discussed, 45 trees of the 61 trees inventoried as part of the Tree Report would be removed, including 43 on-site trees and two City street trees. However, as detailed in the Tree Report included in Appendix A, none of the trees are considered to be protected by the Protected Tree and Shrub Ordinance.[54] The Project would provide 79 new on-site trees on the ground floor and on various building levels and would replace the removed street trees in compliance with the City's Urban Forestry Division standards and subject to approval by the Board of Public Works. As this is less than the 123 on-site trees required by LAMC Section 12.21 G.2(a)(3), the Project will utilize the provisions of Ordinance No. 185,573 to pay an in-lieu fee for the provision of the remainder of the 44 trees to meet the required 123 trees. ***Therefore, with the approval of this request, the Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.***

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As previously described, the Project Site does not support any known habitat or natural community.

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[53] *Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.*

[54] *NOREAS, 6136 Manchester Project–Arboricultural Inventory and Report, June 2023. See Appendix A of this SCEA.*

Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[55] ***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**

**Less Than Significant Impact.** Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located within the vicinity of the Project Site. Thus, the cumulative analysis in this SCEA takes into consideration the seven related projects within 1 mile of the Project Site, as identified in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA. Neither the Project Site nor any of the related projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur. As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the related projects would comply with applicable regulatory requirements regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. ***As such, no significant cumulative impacts regarding biological resources would occur.***

# 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

[55] *CDFW, California Natural Community Conservation Plans, August 2023.*

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***

Consistent with Mitigation Measure PMM CULT-1(a) from the 2020–2045 RTP/SCS PEIR, a record search was conducted to determine if the Project area has been previously surveyed and whether historical resources were identified. In addition, consistent with Mitigation Measure PMM CULT-1(b) from the 2020–2045 RTP/SCS PEIR, a Historic Resources Assessment of the Project Site and surrounding properties was prepared by Historic Resources Group (October 2024), which is included as Appendix C of this SCEA. As described below, the Historic Resources Assessment concluded that no significant impacts to historic resources would occur as a result of the Project. In addition, consistent with Mitigation Measure PMM CULT-1(f), a CHRIS record search was conducted through the SCCIC, which identified one study area and one archaeological site believed to overlap the Project Site (refer to Response to Checklist Question V.b, for a summary of records search findings). Since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project. Therefore, the Project would incorporate relevant measures from Mitigation Measure PMM CULT-1 from the 2020–2045 RTP/SCS PEIR (i.e., PMM CULT-1 (k and l)), as detailed below, which would address the inadvertent discovery of archaeological resources. The remainder of the measures included in PMM CULT-1 from the 2020–2045 RTP/SCS PEIR are not applicable to the Project, as existing regulatory measures that would apply to the Project, as outlined below, are equal to or more effective than the remaining measures of PMM CULT-1 from the 2020–2045 RTP/SCS PEIR .

**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

Mitigation Measure PMM CULT-2 from the 2020**–**2045 RTP/SCS PEIR is not incorporated into the Project as the Project would be required to comply with existing regulatory requirements, as detailed below, that are equal to or more effective than PMM CULT-2 from the 2020–2045 RTP/SCS PEIR to ensure there would be no impacts associated with the disturbance of human remains. Thus, Mitigation Measure PMM CULT-2 from the 2020**–**2045 RTP/SCS PEIR is not applicable to the Project.

## SCAG 2024–2050 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. 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 Plan 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 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 feasible 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 Secretary of the Interior's 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 Secretary of the Interior's PQS. Recordation should meet the Secretary of the Interior's 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 Secretary of the Interior's 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 Plan 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 records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the Plan area for archaeological resources.

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 are determined significant or unique through Phase II testing, and avoidance is not feasible, appropriate resource-specific mitigation measures should be established by the lead agency and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Archaeological materials collected from a significant resource should be curated with a recognized scientific or educational repository.

j) If a record search or archaeological 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, retain an archaeological monitor to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the Secretary of the Interior's 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. If the archaeologist determines that the

discovery is significant, it should be curated with a recognized scientific or educational repository.

***Applicability to the Project***

Consistent with Mitigation Measure PMM CULT-1(a) from the 2024–2050 RTP/SCS PEIR, a record search was conducted to determine if the Project area has been previously surveyed and whether historical resources were identified. In addition, consistent with Mitigation Measure PMM CULT-1(b) from the 2024–2050 RTP/SCS PEIR, a Historic Resources Assessment of the Project Site and surrounding properties was prepared by Historic Resources Group (October 2024), which is included as Appendix C of this SCEA. As described below, the Historic Resources Assessment concluded that no significant impacts to historic resources would occur as a result of the Project. In addition, consistent with Mitigation Measure PMM CULT-1(f) from the 2024–2050 RTP/SCS PEIR, a CHRIS record search was conducted through the SCCIC, which identified one study area and one archaeological site believed to overlap the Project Site (refer to Response to Checklist Question V.b, for a summary of records search findings). Since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project. Therefore, the Project would incorporate relevant measures from Mitigation Measure PMM CULT-1 from the 2024–2050 RTP/SCS PEIR (i.e., PMM CULT-1 (k and l)), as detailed below, which would address the inadvertent discovery of archaeological resources. The remainder of the measures included in PMM CULT-1 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project, as existing regulatory measures that would apply to the Project, as outlined below, are equal to or more effective than the remaining measures of PMM CULT-1 from the 2024–2050 RTP/SCS PEIR.

**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. 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:

– 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.

– 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*

Mitigation Measure PMM CULT-2 from the 2024–2050 RTP/SCS PEIR is not incorporated into the Project as the Project would be required to comply with existing regulatory requirements, as detailed below, that are equal to or more effective than PMM CULT-2 from the 2024–2050 RTP/SCS PEIR to ensure there would be no impacts associated with the disturbance of human remains. Thus, Mitigation Measure PMM CULT-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

### Impact Analysis

*The analysis of potential impacts to historic and archaeological resources is largely based on the Historical Resources Assessment Report (Historic Resources Assessment), prepared by Historic Resources Group, dated October* 2024*, included as Appendix C of this SCEA.*

### a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

**Less Than Significant Impact.** Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so, (2) a determination of whether the proposed project will result in a "substantial adverse change" in the significance of the resource or resources. A "substantial adverse change" in the significance of a historical resource is an alteration that materially impairs the physical characteristics that convey its historical significance and justify its eligibility.

#### On-Site Resources (Direct Impacts)

As discussed in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As part of the Project, the existing commercial structures would be removed.

A records search was conducted for the Project area by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project Site (see Attachment B of Appendix L of this SCEA). The records search includes a review of all recorded archeological sites within a 0.5-mile radius of the Project Site as well as a review of cultural resource reports on file. The California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Historic Resources Inventory, and City of Los Angeles Historic-Cultural Monuments (HCM) listings were also reviewed for the Project Site. The records search indicates that there are no historic resources located on-site.

As described in the Historic Resources Assessment, included as Appendix C of this SCEA, the existing buildings on the Project Site do not appear eligible for listing in the National Register, the California

Register, or as a City of Los Angeles HCM under any criteria. Furthermore, based on the SurveyLA report for the Westchester–Playa del Rey community, which was published in November 2013, there are no historic resources within the Project Site. As such, no historic resources would be demolished, destroyed, relocated, or altered as a result of the Project. Therefore, potential direct impacts to historic resources as a result of development of the Project would be less than significant.

### Off-Site Resources (Indirect Impacts)

As discussed in the Historic Resources Assessment, included as Appendix C of this SCEA, the Westchester Triangle Commercial Historic District (Historic District) is located adjacent to the Project Site across Truxton Avenue. Identified by SurveyLA in 2013, the Historic District was found eligible for listing in the National Register, California Register, and for designation as a City of Los Angeles HCM under Criterion A/1/1. The historic district was found to be an excellent example of a post-World War II neighborhood commercial center in Westchester with low scale commercial buildings.

The historic district, mostly developed between 1947 and 1955 (with one contributor added in 1962), is within the original commercial area planned for the development of Westchester. It was integral to the master plan for the new community, providing services to the surrounding residential areas. The district's inclusion of relatively large parking lots behind its businesses reflects the growing importance of automobile transportation in Los Angeles, particularly in the new postwar residential developments. The Westchester Triangle Commercial Historic District contains 32 parcels, two of which contain parking lots and the rest of which are fully occupied by commercial buildings. Of the district's 28 buildings, 21 (approximately 75 percent) are contributors to its historical significance and seven are non-contributors.

As shown in the Historic Resources Assessment, there are four contributors along Truxton Avenue, immediately to the west of the Project Site. These four contributors are located at: 6204 West Manchester Avenue; 8631 West Truxton Avenue; 6206 West 87th Street; and 8701 South La Tijera Boulevard. Additionally, one non-contributor at 8611 West Truxton is also located across Truxton Avenue from the Project Site.

As determined in the Historic Resources Assessment, the Project would not destroy historic materials, features, or spatial relationships that characterize the Historic District. Consequently, the Project would not affect the integrity of location, design, materials, workmanship, feeling, or association of the Historic District. The only aspect of integrity that could potentially be affected by the Project is integrity of setting. Due to the height of some of the proposed new buildings, the Project would be visible from some locations within the Historic District. However, the visibility of new high-rise construction outside the boundaries of the potential district would not alter the district's setting to such a degree that it would affect its ability to convey its significance. The visibility of nearby new construction and the alteration of the setting outside the potential district's boundaries would not affect the understanding of its historic significance. Setting features important to the significance of the property include the street and sidewalk along Truxton Avenue and general vehicular circulation paths, which will remain intact. New construction associated with the Project will be located across Truxton Avenue. The Historic District was constructed as a commercial core for nearby residential developments to the north and south; the Project would not affect these residential developments. Instead, development would be limited to the east of the Historic District, which has historically been improved with commercial buildings. As such, the historic setting of the Historic District will not be substantially altered, and the Historic District will retain integrity of setting after implementation of the Project.

New construction associated with the Project would include substantial foundation work and the construction of subterranean parking. However, there is little potential for these activities to cause damage to the Historic District due to vibration or settlement given the Historic District's location across the street from the Project Site. As is common in similar urban development sites, vibration and settlement would be controlled through adherence to values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. Furthermore, as discussed further below (Subsection XIII.b, Noise of this SCEA), the estimated vibration velocity levels from on-site construction equipment would be below the significance criteria of 0.12 PPV for the buildings within the Historic District (to the west), 0.2 PPV (inch/second) applicable to the residential buildings to the north, and 0.3 PPV (inch/second) applicable to the commercial buildings to the east of the Project Site. Additionally, the estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. As such, the Project's potential vibration impacts with respect to on-site and off-site construction activities would be kept well below the building damage significance threshold for the Historic District. Therefore, the Project would not result in a substantial adverse change in the significance of Historic District as defined by CEQA and would not result in a significant effect on the environment.

No other historic resources would be demolished, altered, rehabilitated, converted, or relocated by the Project. No other historic resource has the potential to be adversely affected by the new construction or by excavation and construction activity. Therefore, potential indirect impacts to historic resources as a result of development of the Project would be less than significant.

***Based on the above, the Project would not result in a substantial adverse change to the immediate surroundings of nearby historic resources, to the degree that they would no longer be eligible for listing under national, state, or local landmark or historic district programs. As such, impacts would be less than significant, and no mitigation measures are required.***

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

**Less Than Significant Impact with Mitigation Incorporated.** CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. A records search prepared by the South Central Coastal Information Center, included as Attachment B of Appendix L of this SCEA, included a search of the Project Site and a 0.5-mile radius. The results of the records search identified 17 previous cultural resource studies and one archaeological site. Of the 17 previously conducted cultural resources studies, one of the study areas overlapped the Project Site; however, the study does not provide detailed information specific to the Project Site. Additionally, one archaeological site (CA-LAN-214, hereafter LAN-214) was mapped outside the Project Site, but the location and contents are uncertain because they were based on the report of a local resident. However, the description given in the site record would place LAN-214 somewhere within the Project Site.

As discussed in Section 3, Project Description, of this SCEA, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As previously described, the Project would involve excavation of the Project Site up to 35 feet below ground surface (bgs) for the proposed subterranean parking levels. Because the Project Site is fully developed and has undergone previous development, any new archaeological survey is unlikely to observe surface artifacts. Nevertheless, since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project. The Project would implement the following applicable provisions of PMM CULT-1 related to the inadvertent discovery of archaeological resources (i.e., PMM CULT-1 (k and l)):

**2020–2045 RTP/SCS Mitigation Measure PMM CULT-1 (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.

**2020–2045 RTP/SCS Mitigation Measure PMM CULT-1 (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.

**2024–2050 RTP/SCS Mitigation Measure PMM CULT-1 (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.

**2024–2050 RTP/SCS Mitigation Measure PMM CULT-1 (l):** Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.

***Overall, with adherence to Mitigation Measures PMM CULT-2 (k and l) from the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS PEIR MMPs outlined above, 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 with mitigation incorporated.***

**c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less Than Significant Impact**. As discussed above, the Project Site has been subject to previous grading and development. No known traditional burial sites have been identified on-site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e),, if the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5(c)) who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

***With the implementation of regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant. Also refer to Item XVIII, Tribal Cultural Resources, below, regarding the Project's potential impacts to tribal cultural resources.***

**Cumulative Impacts**

**Less Than Significant Impact.** With regard to historic resources, although impacts tend to be site-specific, cumulative impacts could occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As shown in Figure 18 on page 391, the nearest related project to the Project Site is Related Project No. 3, located at 8540 South La Tijera Boulevard. As discussed above, the Project would not result in any direct or indirect impacts to historical resources. Furthermore, the Project would not substantially change the existing look and feel of the surrounding area to the extent that the significance of any nearby historical resource would be impaired. Similar to the Project, Related Project No. 3 would continue to be physically separated from the potentially historical resources in the Project vicinity and would not affect the setting of any of these potential resources. Additionally, the Project Site is not located within the boundaries of a designated historic district, so there would be no potential to contribute to cumulative impacts on a historic district. Furthermore, the Project would not diminish the number or significant of historical resources of the same property types, as the Project Site does not contain any historical resources. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that project-specific mitigation would be applied, as necessary**.**

***Overall, based on the above, cumulative impacts to historical resources, archaeological 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 and 2024–2050 RTP/SCS PEIR Mitigation Measures**

The 2020–2045 and 2024–2050 RTP/SCS PEIR's MMRPs did not identify any mitigation measures specifically regarding Energy. However, Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, outlined in Section VIII, Greenhouse Gas Emissions, below, identifies measures capable of avoiding or reducing the significant effects of increased residential energy consumption. While these mitigation measures mainly serve to reduce the Project's GHG emissions, measures contained in Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs, such as use of energy efficient materials, lighting, and heating and cooling systems, would also serve to reduce the Project's energy usage. As described in the impact analysis below, the Project would incorporate multiple green building and energy efficiency measures in compliance with CALGreen and the LA Green Building Code. In addition, the Project would provide electric vehicle charging stations and infrastructure as well as bicycle parking spaces in compliance with LAMC requirements. Collectively, these regulatory compliance measures and project features are equal to or more effective than Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs for reducing residential energy consumption. Since the Project would comply with existing energy efficiency standards and incorporate energy reduction practices, the Project would not result in a wasteful or inefficient use of energy. Thus, relative to energy, the measures included in Mitigation Measure PMM GHG-1 from the 2020–2045 and 2024–2050 RTP/SCS PEIRs are not incorporated into the Project.

**Impact Analysis**

**a. Would the project 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.** With regard to Energy Threshold (a), this analysis relies upon Appendix F of the CEQA Guidelines as well as the *L.A. CEQA Thresholds Guide*. Appendix F of the

CEQA Guidelines was prepared in response to the requirement in PRC Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* states that a determination of significance shall be made on a case-by-case basis, considering the following factors:

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

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

a) 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;

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

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

d) The degree to which the project complies with existing energy standards;

e) The effects of the project on energy resources;

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

g) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

The following analysis considers these eight criteria (a through g) in the analysis below.

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

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, and maintenance activities).

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities of the structures constructed under this Project would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

### Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new buildings, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in Table 12 on page 155 and as discussed further below, Project construction would consume approximately a total of 20,145 gallons of gasoline, and approximately 170,853 gallons of diesel.

#### Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas and/or diesel-powered portable generators, as required. As shown in Table 12, approximately 17,132 kilowatt-hours (kWh) of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during Project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

#### Natural Gas

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

#### Transportation Energy

The petroleum-based fuel use summary provided in Table 13 on page 156 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on and off-road vehicles would consume an estimated

**Table 12**
**Summary of Energy Use During Construction[a]**

| Fuel Type | Quantity |
|---|---|
| **Electricity** | |
| Water Consumption (Dust Control)[b] | 1,760 kWh |
| Construction Temporary Power (Lighting, power tools) | 15,372 kWh |
| **Total Electricity** | **17,132 kWh** |
| **Gasoline** | |
| On-Road Construction Equipment | 20,145 gallons |
| Off-Road Construction Equipment | 0 gallons |
| **Total Gasoline** | **20,145 gallons** |
| **Diesel** | |
| On-Road Construction Equipment | 101,923 gallons |
| Off-Road Construction Equipment | 68,930 gallons |
| **Total Diesel** | **170,853 gallons** |

*kWh = kilowatt-hour*

*Note: Numbers may not add up exactly due to rounding.*

[a] *Detailed calculations are provided in Appendix D of this SCEA.*

[b] *Energy usage associated with supply and conveyance of water from the source.*

*Source: Eyestone Environmental, August 2024.*

20,145 gallons of gasoline and approximately 170,853 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.0005 percent of the 2026 annual on-road gasoline-related energy consumption and 0.027 percent of the 2026 annual diesel fuel-related energy consumption in Los Angeles County.[56]

### Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project would increase electrification by installing space heating, water heating and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas, consistent with the City's Ordinance No 187,714 (All-Electric Buildings Ordinance). As shown in Table 13 on page 156, the Project's net demand for electricity would be approximately 4,111,183 kWh per year. As shown in Table 13, the Project's net demand for natural gas would be -137,907 cf per year due to the Project's compliance with the City's All-Electric Buildings Ordinance. As shown in Table 13, the Project's net demand for gasoline and diesel would be 250,012 and 43,483 gallons per year, respectively.

[56] *California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac. Details provided in Appendix D of this SCEA.*

**Table 13**
**Summary of Total Annual Energy Use During Operation[a]**

| Source | Project with Project Features |
|---|---|
| **Electricity[b]** | |
| Building | 3,824,772 kWh |
| Water | 167,940 kWh |
| EV Chargers | 118,471 kWh |
| **Total Electricity** | **4,111,183 kWh** |
| **Natural Gas** | **-137,907 cf** |
| **Mobile (Transportation)** | |
| Gasoline | 250,012 gallons |
| Diesel | 43,483 gallons |
| **Total Transportation Fuel** | **293,495 gallons** |

*cf = cubic feet*

*kWh = Kilowatt-hour*

*EV = electric vehicle*

[a] *Detailed calculations are provided in Appendix D of this SCEA. Energy usage presented is net increase (new construction minus existing uses to be removed).*

[b] *Electricity usage conservatively does not account for the PV system required to comply with Title 24.*

*Source: Eyestone Environmental, August 2024.*

### Electricity

As the Project would comply with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 4,111,183 kWh per year (refer to Table 13). Based on LADWP's 2022 Resource Plan, LADWP forecasts that its total energy sales in the 2029–2030 fiscal year (the Project's buildout year) will be 22,339 gigawatt hour (GWh) of electricity.[57] As such, the Project-related net increase in annual electricity consumption would represent only approximately 0.02 percent of LADWP's projected sales in 2029–2030. In addition, LADWP is committed to ensuring the sustainability of its power supply, and is required to procure at least 60 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

### Natural Gas

The Southern California Gas Company (SoCal Gas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is anticipated to generate a net decrease in the on-site demand for natural

[57] *LADWP, 2022 Final Power Strategic Long-Term Resource Plan.*

gas totaling approximately 137,907 cubic feet (cf) per year, or approximately 378 cf per day. Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.16 billion cf per day in 2029.[58] As the Project's natural gas consumption results in a net decrease in the on-site demand for natural gas, the Project would be consistent with the forecasted 2029 consumption in SoCal Gas's planning area.[59]

### Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As shown in Table 13 on page 156, the Project's net demand for gasoline and diesel would be approximately 250,012 and 43,483 gallons per year, respectively. The Project Site is located in a Job Center, Transit Priority Area (TPA), High Quality Transit Area (HQTA) and a Neighborhood Mobility Area (NMA), as designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective.[60]

Extensive public bus service is also provided within the Project study area. The existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle parking areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. These specific transportation demand management measures include reduced parking, pedestrian project enhancements, and bicycle parking. Furthermore, the Project would install EV-ready and EV-equipped parking spaces at the Project Site. As such, operational impacts to transportation energy would be less than significant.

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

### Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of

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[58] *California Gas and Electric Utilities, 2024 California Gas Report.*

[59] *Consistent with Ordinance No. 187,714 (All-Electric Buildings Ordinance) the Project will include 718,714 cf/year of natural gas usage for restaurant cooking. The Project's natural gas consumption would account for approximately 0.0001 percent of the forecasted 2029 consumption in the SoCalGas planning area.*

[60] *According to the 2020–2045 RTP/SCS an HQTA is a corridor-focused Priority Growth Area (PGA) within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours; an NMA is a PGA with a high number of intersections, low observed travel speed, high mix of uses and high accessibility to "everyday" destinations where complete streets and sustainability policies support and encourage replacing or reducing single and multi-occupant automobile use.*

construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents far less than the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.0005 percent of gasoline usage and approximately 0.027 percent of diesel usage within Los Angeles County, respectively.[61] As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption during the construction period.

**Operation**

Based on LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2029-2030 fiscal year (the Project's buildout year) will be 22,339 GWh of electricity.[62] As such, the Project-related net increase in annual electricity consumption of 4,111,183 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2029. Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area (Appendix I of the Strategic Long-Term Resources Plan).

Based on the 2024 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.16 billion cf per day in 2029.[63] The Project's natural gas consumption results in a net decrease in the on-site demand for natural gas, the Project would be consistent with the forecasted 2029 consumption in SoCal Gas's planning area.

As energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCal Gas' service provision, Project operational impacts on energy usage would be less than significant.

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.3 percent would be sufficient to account for future electrical demand by the Project.[64] Therefore, Project electricity

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[61] *California Air Resources Board, EMFAC2021 Web Database, www.arb.ca.gov/emfac*

[62] *LADWP, 2022 Final Power Strategic Long-Term Resource Plan.*

[63] *California Gas and Electric Utilities, 2022 California Gas Report.*

[64] *LADWP, 2022 Final Power Strategic Long-Term Resource Plan.*

consumption during operational activities would have a negligible effect on load conditions of the power grid.

*d. The degree to which the project complies with existing energy standards*

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[65] Electricity and Natural Gas usage during Project operations presented in Table 10 on page 105 would comply with Title 24 standards and applicable CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

***Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.***

*e. Effects of the Project on Energy Resources*

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2022 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[66] According to the U.S. Energy Information Administration (EIA), the United States currently has over 89 years of natural gas reserves.[67] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

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[65] *Energy Independence and Security Act of 2007, Public Law 110-140.*

[66] *California Gas and Electric Utilities, 2024 California Gas Report.*

[67] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed August 30, 2024.*

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet consumption through 2050.[68] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 35 percent of LADWP's overall energy mix in 2022, the most recent year for which data are available.[69] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would include photovoltaic and solar thermal collectors as required by Title 24. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. [70]

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

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project's high-density design and location in proximity to job centers and retail uses would allow for residents to live closer to services and shopping areas, reducing VMT. The Project design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. Therefore, the Project would encourage the use of efficient transportation alternatives.

*g. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements*

The Project will be required to comply with the City of LA Green Building Code which contain conservation measures that go beyond Title 24/CalGreen. Therefore, the Project would incorporate measures that are above and beyond current State energy conservation requirements. This includes

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[68] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=38&t=6, accessed August 30, 2024.*

[69] *LADWP Annual Power Content Labels for 2022, www.ladwp.com/powercontent, accessed August 30, 2024.*

[70] *California Energy Commission, Systems Assessment & Facilities Siting Division Cartography Unit, California Wind Resource Potential Map.*

many of the measures outlined in SCAG's PMM GHG-1 which would also serve to reduce the Project's energy usage.[71]

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

**Conclusion**

As demonstrated in the analysis above, the Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements. ***Thus, overall, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation, and impacts would be less than significant.***

**b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact**. With regard to Energy Threshold (b) the Project was evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed under Item VIII, Greenhouse Gas Emissions, of this SCEA, the Project would also be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

As discussed under Item VIII, Greenhouse Gas Emissions, of this SCEA, the City published its LA Green Plan/ClimateLA in 2007 as well as the Green New Deal Sustainable City pLAn in 2019, which outlines goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA

[71] *Implementation of PMM GHG-1 is not required.*

Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2022 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

Regarding transportation uses, the Project design would reduce VMT throughout the region and encourage use of alternative modes of transportation. The Project would also be consistent with regional planning strategies that address energy conservation. As discussed above and under Item XI, Land Use and Planning, of this SCEA, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS focus on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS focus on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Most notably, the Project would be an infill mixed-use development developed within an HQTA, TPA, Job Center, and NMA. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro, and LADOT. The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. The State Office of Planning and Research recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal).

Consistent with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, the Project would result in an approximately 26-percent reduction in VMT from mobile sources in comparison to a Project without reduction measures (e.g., density and proximity to transit, TDM measures, and mitigation measures), and, consequently, the Project's petroleum-based fuel usage would be reduced.[72] In addition, the Project would comply with state energy efficiency requirements, and would use electricity from LADWP, which has a current renewable energy mix of 35 percent. All these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel.

The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides 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 Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for:

[72] *The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites.*

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 of Los Angeles adopted and released the City's first ever Sustainable City pLAn, which set short-term and long-term energy and conservation targets geared towards advancing the City's economy and equity. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing 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 GHG emissions above and beyond the 2015 pLAn to ensure that the City stays within its carbon budget between now and 2050.[73] A consistency analysis is provided under Item VIII, Greenhouse Gas Emissions, which outlines specific policies of the Green New Deal that the Project would be consistent with. To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels. ***Based on the above, the Project would be consistent with adopted energy conservation plans. The Project would incorporate features to comply with regulatory standards which would ensure that the Project would not conflict with energy and conservation measures provided by the state or City, and as such, impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact**. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is the SoCal Gas service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. As with the Project, with compliance with existing energy standards, including implementation of the City's All-Electric Buildings Ordinance, and compliance with adopted energy conservation plans, the related projects also would not result in the wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. In addition, as evaluated above, the Project would result in less than significant impacts related to energy consumption. Therefore, the Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. ***As such, the Project's impacts would not be cumulatively considerable and cumulative energy impacts would be less than significant.***

[73] *City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAn 2019.*

# 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 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. | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| 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 181B 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 waste water disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☐ | ☒ |
| f. Directly or indirectly destroy a unique paleontological resource or site 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; best management practices (BMPs); and an inspection and monitoring program.

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

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 Mitigation Measure PMM GEO-1(a) from the 2020–2045 RTP/SCS PEIR, a geotechnical investigation was prepared for the Project, which includes site-specific recommendations for the geologic and soil conditions of the Project Site. 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 and building 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 Mitigation Measure PMM GEO-1 from the 2020–2045 RTP/SCS PEIR as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed Project building would be constructed in accordance with all City-required geotechnical requirements. In addition, as analyzed below, the Project would not result in potentially significant impacts regarding geology and soils issues that would require mitigation. As such, Mitigation Measure PMM GEO-1 from the 2020–2045 RTP/SCS PEIR 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 the Project Site. Notwithstanding, since the Project would include excavation to previously undisturbed depths, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. Therefore, the Project would implement Mitigation Measure GEO-MM-1, which is equal to or more effective than the relevant measures included in Mitigation Measure PMM GEO-2 from the 2020–2045 RTP/SCS PEIR, to address the inadvertent discovery of paleontological resources. Thus, Mitigation Measure PMM GEO-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 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 minimize the potential for adverse effects associated with surface fault rupture, seismic ground shaking, seismic-related ground failure, liquefaction, and landslides for projects located on sites with unusual geologic conditions, the following measures shall be considered:

- Use interim precautionary steps during construction to maintain ground surface and slope stability;
- Incorporate design and structural features that exceed the requirements of the applicable building code(s) as appropriate; and
- Utilize innovative design techniques for buildings and other structural elements located on sites with unique geologic conditions to ensure that projects do not exacerbate risks associated with existing conditions.

***Applicability to the Project***

Consistent with Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR, 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 LADBS review and approval, prior to the issuance of grading and building permits for the Project. Compliance with existing regulatory requirements would be equal to or more effective than

the measures included in Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed Project building would be constructed in accordance with all City-required geotechnical requirements. In addition, as analyzed below, the Project would not result in potentially significant impacts regarding geology and soils issues that would require mitigation. As such, Mitigation Measure PMM GEO-1 from the 2024–2050 RTP/SCS PEIR 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 geologic hazards. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) While compliance with the various municipal regional stormwater permits (MS4) is required by law, not all areas are necessarily covered. For those areas that are not covered under a municipal stormwater permit (MS4), 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 stormwater. Road cuts should be designed to maximize the potential for revegetation.

***Applicability to the Project***

The Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. As such, Mitigation Measure PMM GEO-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**PMM GEO-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 paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) For sites where the presence of paleontological resources is considered possible, as appropriate obtain review by a qualified paleontologist (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.

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

c) 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 resources 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 SVP or 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.

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

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

f) 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.

g) 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 CEQA lead agency 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 the Project Site. Notwithstanding, since the Project would include excavation to previously undisturbed depths, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. Therefore, the Project would implement Mitigation Measure GEO-MM-

1, which is equal to or more effective than the relevant measures included in Mitigation Measure PMM GEO-3 from the 2024–2050 RTP/SCS PEIR, to address the inadvertent discovery of paleontological resources. Thus, Mitigation Measure PMM GEO-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

The following analysis is largely based on the Preliminary Geotechnical Engineering Investigation—6136 West Manchester and 8651 South La Tijera prepared for the Project by GeoConcepts, Inc., dated February 7, 2022, and an Update Report dated July 27, 2022 (collectively, the Geotechnical Investigation), which are included as Appendix E.1 and E.2 of this SCEA. The Geotechnical Investigation was approved by the LADBS on February 3, 2023.[74]

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

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

**Less Than Significant Impact.** Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Based on the Geotechnical Investigation and a review of the City's ZIMAS system, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Preliminary Fault Rupture

[74] *City of Los Angeles, Department of Building and Safety, Preliminary Soil Report Approval Letter, February 3, 2023. This letter is also included as Appendix E.3 of this SCEA.*

Study Area, and no known active faults underlie the Project Site.[75,76] As shown in Appendix I of the Geotechnical Investigation, the closest active fault to the Project Site that is considered capable of surface rupture is the Newport–Inglewood Fault, located approximately 2.6 miles northeast of the Project Site.[77] Therefore, as there are no known faults underlying the Project Site, the risk for surface rupture at the Project Site is considered low. Furthermore, while the Project would involve excavation up to 35 feet bgs for the subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Nevertheless, the Project would comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. ***Compliance with existing City regulatory requirements would further ensure that the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to rupture of a known earthquake fault. Impacts would be less than significant.***

### ii. Strong seismic ground shaking?

**Less Than Significant Impact.** The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site and therefore, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to strong seismic ground shaking. In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking. Therefore, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Additionally, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. The final geotechnical report would include the recommendations of the Geotechnical Investigation included as Appendix E.2 of this SCEA, and its final recommendations would be enforced by the LADBS for the construction of the Project. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations,

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[75] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011.*

[76] *City of Los Angeles, Preliminary Fault Rupture Study Areas, https://geohub.lacity.org/datasets/lahub::preliminary-fault-rupture-study-areas-city-of-los-angeles/explore?location=33.966167%2C-118.380738%2C14.18, accessed May 15, 2024.*

[77] *GeoConcepts, Inc., Preliminary Geotechnical Engineering Investigation—6136 West Manchester and 8651 South La Tijera, February 7, 2022, page 32. (Appendix E.2 of this SCEA).*

including, but not limited to, the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, and the City's General Plan Safety Element. ***Therefore, based on the above, through compliance with regulatory requirements, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to exposure to strong seismic ground shaking would be less than significant.***

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Seismic Hazard Zone Map for the Venice Quadrangle, the Project Site is not located within a liquefaction hazard zone.[78] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The City's Local Hazard Mitigation Plan also indicates that the Project Site is not located within a liquefaction zone.[79] Furthermore, ZIMAS indicates that the Project Site is not located in an area that has been identified by the State as being potentially susceptible to liquefaction.

***Based on the above, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. Thus, impacts would be less than significant.***

### iv. Landslides?

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is located within an urban area and is relatively flat with little topography. The Project Site is not located in a landslide area as mapped by the State of California.[80] Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.[81,82] There are no known landslides near the Project Site, and the Project Site is not in the path of any known or potential

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[78] *California Department of Conservation, California Geological Survey, State of California Seismic Hazards Zones Map, Venice 7.5 Minute Quadrangle, March 25,1999.*

[79] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 9-21, West Los Angeles APC Liquefaction Zones, p. 9-28.*

[80] *California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed May 15, 2024.*

[81] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 11-12, Landslide Hazard Areas in the West Los Angeles APC, p. 11-13.*

[82] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011.*

landslides. The Project Site's existing topography would not be substantially altered by the Project and development of the Project would not cause landslides. ***As such, the Project would not exacerbate existing conditions that would directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur.***

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

**Less Than Significant Impact.** The Project Site is currently fully developed with buildings and surface parking. As such, there are no extensive open spaces with exposed topsoil. However, construction of the Project would require grading, excavation associated with the installation of building footings and subterranean parking, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion. However, this potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed, except for some landscaping located throughout the Project Site. However, the landscaping would include trees to prevent soil erosion. ***Therefore, with compliance with applicable regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil during construction or operation. Impacts would be less than significant.***

**c. Would the project 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?**

**Less Than Significant Impact.** As discussed above, the Project Site is not located near slopes or geologic features that would result in or exacerbate on or off-site landsliding. Therefore, no impacts related to landslides would occur.

As previously discussed, liquefaction-related effects include lateral spreading, which refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. As summarized above and discussed in detail in the Geotechnical Investigation, the Project Site is not susceptible to liquefaction and would not potentially result in or exacerbate lateral spreading. Therefore, impacts related to lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the potential for subsidence is considered low.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Investigation, soils underlying the Project Site indicate moderately dense to very dense silty sands and sandy silts. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not 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 collapse. Impacts associated with collapsible soils would be less than significant.

***Overall, based on the above, impacts associated with liquefaction, landslides, lateral spreading, subsidence, and collapsible soils would be less than significant and no mitigation would be required***

**d. Would the project be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As discussed in the Geotechnical Investigation, expansive soils were not encountered on the Project Site. Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design-level Geotechnical Investigation required by the City. ***Therefore, the Project would not create substantial direct or indirect risks to life or property with regard to expansive soil, and impacts would be less than significant.***

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

**No Impact.** The Project Site is served by existing wastewater infrastructure, and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. ***No impact related to the use of septic tanks or alternative wastewater disposal systems would occur.***

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

**Less than Significant Impact with Mitigation Incorporated.**

**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 within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. A Project-specific paleontological records search for the Project Site was conducted by the Natural History Museum of Los Angeles County in August 2022, which is included as Appendix F of this SCEA. As outlined therein, there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site either at the surface or at depth.

As outlined in Table 14 on page 176 and in the paleontological records search, the closest known vertebrate fossil localities to the Project Site are LACM VP 3524, LACM VP 4185-4201, LACM VP 3538, LACM VP 3347, LACM VP 3660, and LACM VP 7493. Given the distance between the closest localities and the Project Site, it is unlikely that very shallow excavations in the deposits underlaying the Project Site are to uncover significant vertebrate deposits. Nevertheless, as the Project would include excavations up to a maximum depth of 35 feet bgs, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present.

### Mitigation Measures

The following mitigation measure is provided to reduce Project impacts related to the inadvertent discovery of paleontological resources:

**GEO-MM-1:** In the event that any paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

**Table 14**
**Closest Known Fossil Localities to the Project Site**

| Locality Number | Location | Formation | Taxa | Depth |
|---|---|---|---|---|
| LACM VP 3524 | North of Malvern Avenue and approximately 0.5 mile west of Gilbert Street, Fullerton, California | Terrace deposits (silty sandstone) | Ungulata | Unknown |
| LACM VP 4185-4201 | Coyote Creek, adjacent to Ralph B. Clark Regional Park in West Coyote Hills | La Habra Formation (Pleistocene; sandy silt shot through with caliche) | Bison (Bison), camel (Camelops), horse (Equus), mammoth (Mammuthus), mastodon (Mamut), elephant clade (Proboscidea), dire wolf (Canis dirus), Coyote (C. latrans), deer (Odocoileus), dwarf pronghorn (Capromeryx),unidentified artiodactyl; sea duck (Chendytes) | Surface, in creek bed |
| LACM VP 3538 | Roadbed of Imperial Highway, approximately 2,200 feet west of Beach Boulevard, Los Angeles, California | Unknown (Pliestocene) | Mammoth (Mammuthus) | Unknown, collected during road construction |
| LACM VP 3347 | 11204 Bluefield, Whittier, California | La Habra Formation (lacustrine silt with caliche and plant detritus) | Horse (Equus) | 2 feet bgs |
| LACM VP 3660 | Cover Street and Pixie Ave, Lakewood, California | Unknown formation (Pleistocene) | Mammoth (Mammuthus) | 19 feet bgs |
| LACM VP 7493 | 30 yards south of Pacific Coast Highway and 10 yards west of Grand Avenue, Long Beach, California | Lakewood Formation | Camel family (Camelidae) | 8.5 feet bgs |

*VP = Vertebrate Paleontology*

*IP = Invertebrate Paleontology*

*bgs = below ground surface*

*Source: Natural History Museum of Los Angeles County, 2022.*

***Based on the above,* the Project would not directly or indirectly destroy a unique geologic feature and, *with adherence to regulatory requirements and implementation of Project Mitigation Measure GEO-MM-1,*, would not directly or indirectly destroy a unique paleontological resource. Thus, impacts would be less than significant with mitigation incorporated.**

**Cumulative Impacts**

**Less Than Significant Impact.** Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the seven related projects identified in Table 36 on page 390 further below) would expose a greater number of people to seismic hazards. However, as with the Project, related projects and other future development project would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular related project site. In addition, in the event that paleontological resources are uncovered, each related project would be required to comply with the applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that project-specific mitigation would be applied, as necessary. ***Therefore, cumulative impacts related to geology and soils (including paleontological resources) would not be cumulatively considerable and 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 consistent with or as effective as the measures included in Mitigation Measure PMM GHG-1 from the 2020–2045 RTP/SCS PEIR. Specifically,

- The Project would integrate green building measures consistent with CalGreen (California Building Code Title 24). Specifically, the Project would comply with Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As discussed above in Section VI, Energy, the Project would include all electric HVAC systems; and Energy Star–labeled all electric appliances in residential areas, 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 and CALGreen's EV charging requirements.

- 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 be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[83] 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.

In addition, the Project would implement Project Design Features that would also serve to reduce GHG emissions. As an example, WAT-PDF-1 would incorporate water conservation features in addition to those measures required by the City's current codes and ordinances. 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, pedestrian network improvements, voluntary travel behavior change, and reduced parking.

**SCAG 2024–2050 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. 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.

[83] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

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. Use no gas-powered landscape maintenance equipment.

ix. Install alternative fuel (i.e., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations.

x. Reduce wood burning stoves or fireplaces.

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

xii. Encourage projects to reduce natural gas infrastructure in buildings and/or reduce the use of natural gas appliances, with exceptions for limited uses

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, day care, and medical care;

   v. Incorporate housing, including affordable housing, into the project;

   vi. Incorporate a 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;

   xii. Unbundle parking costs;

   xiii. Provide parking cash-out programs;

   xiv. Implement or provide access to commute reduction program;

f) Incorporate bicycle and pedestrian facilities into project designs, maintain these facilities, and provide amenities incentivizing their use; and plan for and construct local bicycle projects that connect with the regional network;

g) Improve 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;

h) Adopt employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, provide 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 by providing ride-matching services;

   iv. Provide incentives or subsidies that increase 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 alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations or neighborhood alternative fuel vehicle networks, or charging for electric bicycles;
    v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; and
    vi. Establish methane recovery in Landfills and Wastewater Treatment Plants, where applicable.
k) Consult the SCAG Equity Resources for Action (ERA) Toolbox available on SCAG's Environmental Justice webpage for potential measures to address impacts to low-income and/or communities of color.
l) Require at least five percent of all new vehicle parking spaces include alternative fuel (e.g., electric, hydrogen-fueled, etc.) vehicle charging and fueling stations, or at a minimum, install the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in. Encourage electric vehicle capable (branch circuit and raceway) or ready (charging outlet) spaces to accommodate future growth in electric vehicles.
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
    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 consistent with or as effective as the measures included in Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR, above. Specifically,

- The Project would integrate green building measures consistent with CALGreen (California Building Code Title 24). Specifically, the Project would comply with Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As discussed above in Item VI, Energy, the Project would include all electric HVAC systems; and Energy Star–labeled all electric appliances in residential areas, 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 LED or efficient fluorescent lighting technology. 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 and CALGreen's EV charging requirements.

- Pursuant to the requirements of 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 be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[84] 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.

Overall, the Project would adhere to existing regulatory requirements regarding GHG emissions, which are consistent with or as effective as Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR in reducing substantial adverse effects related to GHG emissions. As such, Mitigation Measure PMM GHG-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

[84] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

## Impact Analysis

### a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less Than Significant Impact.**[85] The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emission that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the analysis focuses on the Project's consistency with statewide, regional and local plans adopted for the purpose of reducing and/or mitigating GHG emissions, as discussed under GHG Threshold (b). The evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG emissions-related impacts on the environment.

Notwithstanding, 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 CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions.[86]

The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

#### Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix B.3 of this SCEA).

The Project includes the construction of a new mixed-use development totaling 416,915 square feet, including 489 residential apartment units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space.[87] As presented in Table 15 on page 187,

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[85] *The Less Than Significant Impact determination is based on the analysis included under GHG Threshold (b).*

[86] *Pursuant to California Public Resources Code Sections 21155.2(b)(1) and 21159.28(a), any Project-specific or cumulative GHG-related impacts associated with vehicular and/or truck trips are disclosed for informational (as opposed to impact evaluation) purposes. The SCEA statute specifies that these specific impacts do not need to be discussed or referenced in the SCEA prepared for the Project.*

[87] *It is noted that the analysis provided herein considers the previously proposed commercial uses (i.e., 11,100 square feet of restaurant space and 5,500 square feet of retail space). As discussed in Section 3, Project Description, of this SCEA,*

*(Footnote continued on next page)*

**Table 15**
**Construction-Related GHG Emissions**
**($MTCO_2e$)**

| Year | $MTCO_2e$[a] |
|---|---|
| 2026 | 1,167 |
| 2027 | 862 |
| 2028 | 587 |
| 2029 | 32 |
| Total | 2,648 |
| **Amortized Over 30 Years[b]** | **88** |

*$MTCO_2e$ = metric tons of an equivalent mass of carbon dioxide*

[a] *$CO_2e$ was calculated using CalEEMod and the results are provided in Section 2.3 of the Construction CalEEMod output file within Appendix B.2 of this SCEA.*

[b] *As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.*

*Source: Eyestone Environmental, August 2024.*

construction of the Project is estimated to generate a total of 2,648 metric tons of GHGs measured as an equivalent mass of carbon dioxide ($MTCO_2e$). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B of this SCEA.

### Operation

The Project would include an increase of residential and commercial uses. This would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements under Title 24 and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

*the Project would include 10,747 square feet of restaurant space and 5,373 square feet of retail space. As such, the analysis provided herein is more conservative as it considers the higher commercial use originally proposed.*

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT as discussed under Item XVII, Transportation, and in the Transportation Assessment included as Appendix K.1 of this SCEA. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix D of the Transportation Assessment). As shown in Table 16 on page 189, the Project, with implementation of regulatory requirements set forth in Title 24 and Los Angeles Green Building Code, including the use of LED lighting, as well as implementation of project design features and mitigation measures outlined herein, including WAT-PDF-1 and TR-PDF-1, would result in approximately 3,098 $MTCO_2e$ annually. As pointed out above, there is not an adopted numerical significance threshold for assessing impacts related to GHG emissions. The following analysis, which includes an evaluation of the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reduction GHG emissions, is, therefore, used to determine the significance of the Project's GHG emissions-related impacts on the environment.

**b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less Than Significant Impact.** As discussed above, in the absence of a quantifiable significant threshold for GHG Threshold (a), the following analysis is uses to determine significance levels related to GHG Threshold (a) and GHG Threshold (b).

**Consistency with Applicable Plans and Policies**

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

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

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[88]

[88] *Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.*

**Table 16**
**Operational Greenhouse Gas Emissions**

| Emission Source | Project With Regulatory Requirements and Project Design Features $CO_2e$ (metric tons)[a] |
|---|---|
| Area[b] | 12 |
| Energy[c] | 634 |
| Mobile[d] | 2,336 |
| EV Charging[e] | (59) |
| Stationary[f] | 23 |
| Solid Waste[g] | 24 |
| Water/Wastewater[h] | 37 |
| Refrigeration | 3 |
| Construction | 88 |
| **Total Emissions** | **3,098** |

[a] *$CO_2e$ was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix B.3 of this SCEA.*

[b] *Area source emissions are from landscaping equipment.*

[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates and account for compliance with 2022 Title 24 Standards and Los Angeles Green Building Code, including Ordinance 187,714 which requires all new buildings to be all electric with the exception of select uses including restaurant cooking.*

[d] *The reduction in mobile source emissions accounts for project features such as increased density and proximity to transit as well as other VMT reduction measures (e.g., unbundled parking) that are included as TR-PDF-1, which would reduce VMT and associated fuel usage in comparison to free-standing sites. This reduction in VMT was calculated within the LADOT VMT Calculator.*

[e] *EV Charging GHG emission reduction accounts for compliance with City requirements.*

[f] *Stationary source emissions are from an on-site emergency generator.*

[g] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates and accounts for compliance with City's mandated diversion goals.*

[h] *Water/wastewater emissions are calculated based on CalEEMod default water consumption rates and accounts for compliance with Los Angeles Green Building Code.*

*Source: Eyestone Environmental, 2024.*

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[89] The 2008 Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our

[89] *Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.*

energy sources, save energy, create new jobs, and enhance public health."[90] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[91]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update).[92] The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the 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. The 2017 Update 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 constraints and reduces emissions at covered sources.[93]

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[94] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future." The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "lifecycle" analysis is required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the

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[90] *Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplan document.htm, last reviewed April 3, 2013, accessed August 30, 2024.*

[91] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.*

[92] *CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017.*

[93] *CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.*

[94] *California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.*

extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which 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 Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[95] The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.[96]

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[97,98] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[99] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[100]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, this analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and

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95 *CEQA Guidelines Section 15064.7(c).*

96 *CEQA Guidelines Section 15130 (f).*

97 *CEQA Guidelines Section 15064.4(a).*

98 *CEQA Guidelines Section 15064.4(a).*

99 *CEQA Guidelines Section 15064.4(a)(1)-(2).*

100 *CEQA Guidelines Section 15064.4(b).*

subsequent updates, SCAG's 2020–2045 RTP/SCS, SCAG's 2024–2050 RTP/SCS, and the City's Green New Deal.

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, SCAG's 2024–2050 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

### CARB's Climate Change Scoping Plan

The Scoping Plan is a strategy the California Air Resources Board (CARB) develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the original plan that was adopted in 2008. The initial Scoping Plan laid out a path to achieve the AB 32 2020 limit of returning to 1990 levels of GHG emissions, a reduction of approximately 15 percent below business as usual activities.[101] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update assessed progress toward achieving the 2020 limit and made the case for addressing short-lived climate pollutants (SLCPs).[102] The second update, the 2017 Scoping Plan Update,[103] shifted focus to the newer Senate (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress toward achieving the AB 32 goal of returning to 1990 levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[104] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working land

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[101] *CARB. 2008. Climate Change Scoping Plan.*

[102] *CARB. 2014. First Update to the Climate Change Scoping Plan.*

[103] *CARB. 2017. California's 2017 Climate Change Scoping Plan.*

[104] *CARB, California's 2017 Climate Change Scoping Plan, 2017.*

sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan. Included in Attachment X of the 2022 Scoping Plan is a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how action at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the City's Green New Deal and Green Building Code.

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of Appendix D.) The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, as not all jurisdictions have sufficient resources (e.g., technical expertise, staffing, funding) to do so, jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's

climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas when developing local climate plans, measures, policies, and actions. "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of Appendix D.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing[105] while demonstrating that a Project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing, or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas), which include Transportation Electrification, VMT Reduction, and Building Decarbonization.[106] A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas and how the Project would serve to support these strategies is provided below.

**Transportation Electrification**

**Convert local government fleets to zero-emission vehicles (ZEV):** The City's Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement was required to follow a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 publicly available Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs.

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[105] *The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, Appendix D, 2022 Scoping Plan Update, November 2022.*

[106] *Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.*

**Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide:** The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future EVSE. However, CALGreen 2022 has been updated to require 40 percent of total residential parking spaces be constructed as EV capable.[107] The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces which is consistent with CALGreen 2022 requirements. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with Ordinance No. 187,719 by installing EV chargers in at least 10 percent of total proposed parking spaces which would meet the CALGreen 2022 requirement. In addition, 40 percent of all new residential parking spaces would be required to be EV "ready," which will be capable of supporting future EV charging equipment, consistent with CalGreen 2022.

### VMT Reduction

**Reduce or eliminate minimum parking standards in new developments and Implement parking pricing or transportation demand management pricing strategies:** The City of Los Angeles Mobility Plan 2035 (Mobility Plan), which is the Transportation Element of the City's General Plan, contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, Mobility Plan Program No. PK.13 and AB 2097 would reduce parking requirements for developments near transit (within half a mile), while Program No. PK.3 would allow for individualized parking requirements where businesses can identify parking demand and can reduce on-site parking with TDM strategies. These reduction strategies would serve to reduce minimum parking standards in order to reduce vehicle trips.

The Project would utilize AB 2097 to provide a reduced number of vehicular parking spaces and would also provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). Therefore, the Project would be consistent with and would not conflict with this reduction strategy to reduce parking standards.

**Implement Complete Streets policies and investments, consistent with general plan circulation element requirements:** The Mobility Plan established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015 consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020. The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition,

[107] *California Green Building Standards Code. Supplement Part 11. July 1, 2024.*

under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. However, the Project would conform to all design element requirements which may affect public rights-of-way, including proper driveway alignment, adequate sidewalk widths, improved lighting elements, and landscaping design which does not hinder sight distance, mobility, or accessibility. Therefore, the Project would not conflict with implementation of Complete Streets policies.

**Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.; Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking; Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood):** These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking. In implementing the Mobility Plan, the City continues to build out networks for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

On April 4, 2024, SCAG adopted the 2024–2050 RTP/SCS, also referred to as Connect SoCal 2024. Similar to the 2020–2045 RTP/SCS, the 2024–2050 RTP/SCS is a long-term plan for the Southern California region that details investment in the transportation system and development in communities to meet the existing and future needs of the region through projects, investments, policies and strategies. While Connect SoCal 2024 remains focused on its core responsibilities, and on the requirements of comprehensive regional transportation planning integrated with the development of a sustainable communities strategy, it also encompasses a holistic approach to programs and strategies that support success of the RTP/SCS, such as workforce development, broadband and mobility hubs. The primary goals of the 2024–2050 RTP/SCS include:

- Mobility: Build and maintain an integrated multimodal transportation network;
- Communities: Develop, connect and sustain livable and thriving communities;
- Environment: Create a healthy region for the people of today and tomorrow; and
- Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region.

While the 2024–2050 RTP/SCS has been adopted by SCAG, the 2024–2050 RTP/SCS has not yet been approved by the California Air Resources Board. In addition, SB 375 does not provide GHG emissions reduction targets specific to the 2024–2050 RTP/SCS that are not also applicable to 2020–2045 RTP/SCS.

The Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project's convenient access to public transit and opportunities for walking and biking would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, Culver City Bus, and Big Blue Bus bus lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage residents and employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

California continues to experience a severe housing shortage. The State must plan for more than 2.5 million residential units over the next eight years, and no less than one million of those residential units must be affordable to lower-income households.[108] This represents more than double the housing planned for during the last eight years.[109] The housing crisis and the climate crisis must be confronted simultaneously, and it is possible to address the housing crisis in a manner that supports the State's climate and regional air quality goals.[110] CAPCOA's Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA's Handbook) provides a VMT reduction measurement for incorporation of low-income housing. Measure T-4 (Integrate Affordable and Below Market Rate Housing) shows a 28.6 percent reduction in VMT for low-income units in comparison to market rate units.

The City's Housing Element of the General Plan provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The current RHNA goal for affordable housing within the City is approximately forty percent of new construction. However, the City's projections show affordable housing comprising twenty percent of new construction, which falls short of the forty percent RHNA goal. In order to address this shortfall, the Housing Element identifies measures to encourage development of affordable housing such as revising density bonuses for affordable housing; identify locations which are ideal for funding programs to meet low-income housing goals; and rezone areas to encourage low-income housing. The Housing Element estimates that implementation of these measures would increase housing production at all income ranges compared to previous cycles.

The City's 40-percent goal of low-income housing for new construction is applicable on a citywide basis and not applicable to an individual project. The Planning Department's Housing Division found, based on market studies and experiences of other agencies, that mandating 20-percent affordable housing on

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[108] *California Department of Housing and Community Development. 2022. Statewide Housing Plan.*

[109] *Ibid.*

[110] *Elkind, E. N., Galante, C., Decker, N., Chapple, K., Martin, A., & Hanson, M. 2017. Right Type, Right Place: Assessing the Environmental and Economic Impacts of Infill Residential Development through 2030, https://ternercenter.berkeley.edu/research-and-policy/right-type-right-place/.*

individual projects is likely to reduce overall housing production, including low income housing, in the City and would be contrary to City and State policies. Pushing more housing outside of the City would be contrary to the Scoping Plan, as infill housing production in the City, which is a highly urbanized city with billions in transit infrastructure, lower average VMT than the SCAG region, is called for in the 2022 Scoping Plan.

The Project will include up to 489 residential units including 64 affordable housing units, representing 13 percent of the total proposed residential units. The Project also has a density that is supportive of transit with 202 dwelling units per acre.[111] The Project's affordable units would serve to support the City in its goal of increasing low-income housing for new construction on a citywide basis.

### Building Decarbonization

**Adopt all-electric new construction reach codes for residential and commercial uses:** The City has adopted an All-Electric Buildings Ordinance effective April 1, 2023 which will reduce GHG emissions related to natural gas combustion. Under this ordinance, all building permit applications for newly constructed buildings will be required to be all-electric with some exceptions such as cooking within restaurant uses. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the All-Electric Buildings Ordinance and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC and All-Electric Buildings Ordinance; the Project's restaurant uses are exempt from the All-Electric Buildings Ordinance and would utilize natural gas for cooking, but these uses would consist of only a small portion of the Project's total square footage. Therefore, the Project would be consistent and not conflict with the City's LAMC.

**Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers):** This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and Los Angeles Department of Water and Power (LADWP) has established rebate programs to promote use of energy-efficient products and home upgrades. Under LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project would be designed and constructed in accordance with the City's Municipal Code and would include, as applicable, highly efficient HVAC systems; energy-efficient wall insulation and glazing units; and Energy Star–labeled appliances. Moreover, the Project would include energy saving technologies and appliances, water-efficient plantings with drought-tolerant species, and pedestrian- and bicycle-

[111] *The minimum density for transit-supportive development is 20 residential du per acre.*

friendly design with short-term and long-term bicycle parking. Therefore, the Project would be consistent with and would not conflict with policies to implement energy efficiency retrofits.

### City of Los Angeles Green New Deal

L.A.'s Green New Deal Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, 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, within L.A.'s Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals. L.A.'s Green New Deal's specific targets include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.[112]

Although L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote its goals. Such measures include increasing renewable energy usage, reduction of per capita water usage, promotion of walking and biking to work, promotion of high-density housing close to major transportation stops, and various recycling and trash diversion goals. The Project would generally be consistent with these goals because it is an infill development within an existing urbanized area that would introduce employment within a High Quality Transit Area (HQTA) which is well served by public transportation. Furthermore, the Project would comply with the CALGreen Code, implement various project design features to reduce energy usage and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas. Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. The Project would also use LED lighting to minimize use of electricity and would use native and drought-tolerant plant species in the landscaping to minimize water use. The Project would also provide parking spaces which are EV ready and with EV-charging stations to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.[113] Therefore, the Project would be consistent with and would not conflict with the City's Green New Deal.

### SCAG 2020–2045 RTP/SCS and 2024–2050 RTP/SCS

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[112] *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019 Targets, https://plan.lamayor.org/targets/targets_plan.html, accessed August 30, 2024.*

[113] *However, as a conservative assumption, the GHG analysis did not take credit for this reduction.*

SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

The goals and policies of the 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service encouraging development within identified. As described by the 2020–2045 RTP/SCS, Priority Growth Areas (PGAs), which include HQTAs, Job Centers, Transit Priority Areas (TPAs), NMAs, Livable Corridors, and Spheres of Influence (SOIs). PGAs will account for less than 4 percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The Project Site is located within five identified PGAs, including a HQTA, Job Center, TPA, NMA, and Livable Corridor.

Instead of PGAs, SCAG's 2024–2050 RTP/SCS utilizes the revised nomenclature of Priority Development Areas (PDAs), which are areas within the SCAG region where future growth can be located to help the region reach the 2024–2050 RTP/SCS goals. Generally, this means that people in these areas have access to multiple modes of transportation or that trip origins and destinations are closer together, allowing for shorter trips. As a general principle, development in overlapping PDAs indicates a greater alignment with the 2024–2050 RTP/SCS goals. PDAs include NMAs, TPAs, and Livable Corridors, and the Project Site is located within each of these identified PDAs. The Project would improve mobility and accessibility, encourage transit use, and reduce VMT by intensifying urban density in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office and retail uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel.

The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.[114] Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets,

[114] *SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.*

the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

With regard to individual developments, such as the Project, the strategies and policies set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The Project's consistency with these general categories of strategies and policies are each discussed below.

### Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.[115] By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. HQTAs will account for 3 percent of regional total land but are projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The overall land use pattern in the 2020–2045 RTP/SCS reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2024–2050 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2019 and currently includes approximately 6.2 million homes and 9.0 million jobs.[116] By 2050, the integrated growth forecast projects that these figures will increase by 2.1 million people, with nearly 1.6 million more homes and 1.3 million more jobs. NMAs, TPAs, and Livable Corridors will account for 8.2 percent of regional total land but are projected to accommodate 66 percent and 54 percent of future household and employment growth respectively between 2019 and 2050. The overall land use pattern in the 2024–2050 RTP/SCS reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

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[115] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

[116] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

As discussed below under Item XIV, Population and Housing, of this SCEA, the Project would increase the residential population as well as the daytime population (employees) within the Project Site. Specifically, based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 1,159 residents.[117] The Project's 16,120 square feet of ground-floor commercial space would generate approximately 19 net new employees based on employee generation rates developed by the LADOT.[118] This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region, as detailed below under Item XIV, Population and Housing. Furthermore, while the Project would generate jobs associated with construction of the Project, these employment opportunities would be short-term opportunities during construction and are employment positions that circulate throughout the region based on the construction site. Therefore, due to the Project's minimal increase in population and employment in the City, the Project would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS, which were also used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

With regard to consistency with growth projections for the 2024–2050 RTP/SCS, as discussed below in Section XIV, Population and Housing, the Project would represent approximately 1.86 percent of the projected growth in the SCAG region between 2024 and 2029 (i.e., the Project's baseline and anticipated buildout years) and approximately 0.10 percent of the projected employment growth in the SCAG Region between 2024 and 2029. Therefore, the Project's contribution to population and employment growth would be also consistent with projections contained in the 2020–2045 RTP/SCS.

Consistent with the SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide residents and employees with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions. The Project would concentrate new development within 0.5-mile (walking distance) of bus lines serviced by Metro, Culver City Bus, Santa Monica Big Blue Bus (BBB) and LADOT Commuter Express (CE) bus lines. Thus, residents and employees are provided with an alternative to single-occupant vehicle travel that would facilitate a reduction in VMT and corresponding vehicular GHG emissions. As such, the Project's location provides some opportunities for the use of public transit to reduce vehicle trips. Moreover, the Project would represent a development within an existing semi-urbanized area that would include residential uses near other residential and commercial uses.

As discussed above, the Project would incorporate reduction measures to which will reduce VMT in comparison to a Project without reduction features. The Project's estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. The Project represents a development within an existing urbanized area that would concentrate new residential uses within an HQTA/HQTC, TPA,

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[117] *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.*

[118] *Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 2 employees per 1,000 square feet of "General Retail" and 4 employees per 1,000 square feet of "High- Turnover Sit-Down Restaurant."*

Job Center, and NMA and adjacent to a Livable Corridor. The convenient access to public transportation and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

### Consistency with VMT Reduction Strategies and Policies

As discussed under Item XI, Land Use and Planning, the Project includes GHG-reducing strategies from the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS that are applicable to the Project. Specifically, and as shown in Table 17 on page 246 in the analysis further below, the Project includes characteristics that are consistent with strategies identified in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, and that would reduce Project trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. Such characteristics and VMT reducing measures include developing a mix of residential and commercial uses in close proximity to other residential and commercial uses, because in comparison, a similar project located further away from major residential centers or mass transit would not achieve a similar reduction in VMT. In addition, the Project would include EV parking at the Project Site reducing mobile source GHG emissions.

As discussed above, the Project represents an infill development within an existing urbanized area that would concentrate new residential uses within an HQTA/HQTC TPA, and NMA and along a Livable Corridor. Furthermore, in accordance with Ordinance No. 185,480, the Project would provide bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking. These project features would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

### Increased Use of Alternative Fueled Vehicles Policy Initiative

The second category of strategies and policies of the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, regarding individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The 2020–2045 RTP/SCS and 2024–2050 RTP/SCS policy initiatives focus on accelerating the deployment of a zero-emission transportation system. As discussed above, the Project Site would set aside parking spaces with EV charging equipment and spaces that support future EVSE. Therefore, the Project would support the alternative fueled vehicle policy initiative.

### Energy Efficiency Strategies and Policies

The third goal within the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. The 2024–2050 RTP/SCS policy initiative focuses on exploring and advancing the transition toward zero-emission and clean technologies and other transformative technologies, where viable. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage 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 would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would also use LID techniques to minimize the amount of stormwater that leaves the Project Site.

### Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are plans adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, this SCEA also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are discussed under Item XI, Land Use and Planning, of this SCEA. As shown under Item XI, the Project is consistent with the goals and principles set forth in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS.

In sum, the Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long term climate policies.[119] By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Overall, the Project would not conflict with the 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, which are intended to reduce GHG emissions.

### Conclusion

In conclusion, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code.[120] As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts, and would also not conflict with SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. Moreover, the Project would meet LEED Silver equivalency

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[119] *As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.*

[120] *The Project's GHG emissions inventory does not take into account future regulations and legislation to reduce GHG emissions to achieve carbon neutrality by 2045. However, for all the reasons described above, the Project would support the State's goals of Executive Order B-55-18 as well as AB 32 and SB 32 to achieve carbon neutrality by 2045.*

and include all electric appliances in the residential units. As such, the Project would comply with the Sustainable City pLAn/L.A.'s Green New Deal.

***Overall, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. In addition, in the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project would not generate GHG emissions that may have a significant impact on the environment. Thus, impacts relative to GHG Threshold (a) and GHG Threshold (b) would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis provided above already considers the potential for the Project to contribute to the cumulative impact of global climate change. As demonstrated in the above analysis, the Project would be consistent with CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The Project would also be consistent with SCAG's 2020–2045 RTP/SCS' and 2024–2050 RTP/SCS' regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors by 2035. Furthermore, the Project would generally comply with the intent of L.A.'s Green New Deal, which includes specific targets related to housing and development, and mobility and transit. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

# VIX. 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? | ☐ | ☒ | ☐ | ☐ |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment? | ☐ | ☐ | ☒ | ☐ |
| 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 the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.

b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:

- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. 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 Mitigation Measure PMM HAZ-1 from the 2020–2045 RTP/SCS PEIR, 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. Existing regulations are equal to or more effective than Mitigation Measure PMM HAZ-1 from the 2020–2045 RTP/SCS PEIR. Therefore, Mitigation Measure PMM HAZ-1 from the 2020–2045 RTP/SCS PEIR is not incorporated into 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*

Mitigation Measure PMM HAZ-2 from the 2020–2045 RTP/SCS PEIR includes measures regarding the transport of hazardous materials. No significant impacts are anticipated in relation to the transport of such materials. However, consistent with this SCAG measure, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable 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 than Mitigation Measure PMM HAZ-2 from the 2020–2045 RTP/SCS PEIR. As such, this measure is not incorporated into 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 0.25 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 0.25 mile of schools, when school is in session, wherever feasible.

b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

***Applicability to the Project***

The Project would not emit or handle hazardous materials in proximity to an existing school. However, the Project Site is located approximately 0.16-mile southwest of a proposed school (Charter Middle School), located at 8540 South La Tijera Boulevard.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, Mitigation Measure PMM HAZ-3 from the 2020–2045 RTP/SCS PEIR 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 Mitigation Measure PMM HAZ-4 from the 2020–2045 RTP/SCS PEIR, a Phase I ESA and Phase II ESA were prepared for the Project. Based on the findings of the Phase II ESA, the Project would implement Project Mitigation Measures HAZ-MM-1 and HAZ-MM-2, which would ensure that potential 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 incorporation of Project-specific mitigation measures would be more effective than Mitigation Measure PMM HAZ-4 from the 2020–2045 RTP/SCS PEIR, and as such, Mitigation Measure PMM HAZ-4 would not be incorporated as part of 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-1, which, consistent with current and standard City policy, would require the preparation and City approval of a Construction Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDR-1 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-5 from the 2020–2045 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-5 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of the Project.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM HAZ-1:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials and hazardous materials releases, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) Reduce train speeds when train cars contain hazardous material to 40 miles per hour when passing through urbanized areas of any size.

b) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.

c) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.

d) 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.

e) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.

f) 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 Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR, 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. Existing regulations are equal to or more effective than Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR. Therefore, Mitigation Measure PMM HAZ-1 from the 2024–2050 RTP/SCS PEIR is not incorporated into 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 substantial adverse effects related to the release of hazardous materials within 0.25 miles of schools, 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) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within 0.25 miles of schools, when school is in session, wherever feasible.

b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 miles of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

***Applicability to the Project***

The Project would not emit or handle hazardous materials in proximity to an existing school. However, the Project Site is located approximately 0.16-mile southwest of a proposed school (Charter Middle School), located at 8540 South La Tijera Boulevard.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, Mitigation Measure PMM HAZ-2 from the 2024–2050 RTP/SCS PEIR 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 projects that are located on a site that is included on the Cortese List of hazardous waste and substances sites, 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) If warranted by the Phase I report, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a 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 USEPA to determine the extent of potential contamination beneath all underground storage tanks, 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 (including dewatering effluent), 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 (including dewatering effluent), 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 (including dewatering effluent) 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, 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, LBP, and any other building materials or stored materials classified as hazardous waste by state or federal law.

o) Where the remediation of LBP 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 Construction Lead Standard, CCR Title 8 Section 1532.1 and Department of Health Services 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***

As described below, a Phase I ESA was prepared for the Project. The Phase I ESA for the Project Site obtained a database search report from Environmental Data Resources, Inc. (EDR), which is included as Appendix C of the Phase I ESA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. As discussed therein, the Project Site is not included on the Cortese List of hazardous waste and substances site. As such, Mitigation Measure PMM HAZ-3 from the 2024–2050 RTP/SCS PEIR 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that 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:

- Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.
- 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 maximum extent feasible.
  - Usage of designated haul routes to minimize truck traffic on local roadways to the maximum extent feasible.
  - 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***

Consistent with this measure, the Project would implement Project Design Feature TR-PDF-1, which, consistent with current and standard City policy, would require the preparation and City approval of a Construction Management Plan to ensure that adequate emergency access is maintained during construction of the Project. Project Design Feature TR-PDR-1 is equal to or more effective than the measures identified in Mitigation Measure PMM HAZ-4 from the 2024–2050 RTP/SCS PEIR. As such, Mitigation Measure PMM HAZ-4 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

**Impact Analysis**

*The following analysis is based, in part, on the Environmental Site Assessment—Phase I, Environmental Site Assessment Report (Phase I ESA) for 6136 W. Manchester Avenue and 8651 La Tijera Boulevard, prepared for the Project by Partner Engineering and Science, Inc., dated November 30, 2021, and the Phase II Subsurface Investigation Report (Phase II ESA), dated November 10, 2022, which are included as Appendix G.1 and G.2 of this SCEA.*

**a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.**

**Construction**

The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. In addition, all potentially hazardous materials to be used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. ***Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.***

**Operation**

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Due to the type of development proposed (e.g., residential and commercial uses), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. ***Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.***

**b. Would the project 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 With Mitigation Incorporated.** As concluded in the Phase I ESA and the Phase II ESA prepared for the Project and analyzed below, with adherence to regulatory requirements and implementation of mitigation measures outlined below, construction and operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accidents conditions involving the release of hazardous materials into the environment.

The Phase I ESA included historical site utilization research and a site reconnaissance to identify potential on-site hazards. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. Types of RECs can include Historical Recognized Environmental Conditions (HRECs),

which are RECs that have been addressed to the satisfaction of the applicable regulatory authority or have met unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls; and Controlled Recognized environmental Conditions (CRECs), which are RECS that have been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

As discussed in the Phase I ESA, the Project Site was developed with agricultural uses by 1928; and redeveloped with the current northern building by 1957 and developed with the southern building by 1966. The northern portion of the Project Site was occupied by a Safeway Store in 1958, a Standard Brands Paint Store from 1978 to 1996, and the existing Pep Boys Automotive Center since 1997. The southern portion of the Project Site was developed with a gasoline service station (Ron's Signal Service Station) in 1966, Humble Oil in 1968, Eco's Service Stations in 1971, Georges Exxon Service Station from 1975 to 1985 and La Tijera Arco from 1990 to 1995. The southern portion of the Project Site has been occupied by a Del Taco since 1999.

### Construction

#### Hazardous Waste Generation, Handling, and Disposal

As discussed above, during Project demolition, grading/excavation, and building, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. 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

The Phase I ESA did not identify any HRECs or CRECs in connection with the Project Site. However, the following RECs were identified:

- 6136 West Manchester Avenue filed an application for underground storage tank (UST) installation on October 27, 1975, and the 10,000-gallon UST was removed on April 9, 1985. In 1995, McLaren/Hart Environmental Engineering Corporation collected two soil samples from the area adjacent to the former UST at 15-feet below grade. The samples were analyzed for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene and xylenes (BTEX) and acetone. Results were not detected above the laboratory limits. However, soil vapor was not sampled and may represent a vapor intrusion risk.

- 8651 La Tijera Boulevard operated as a gasoline station from 1949 to 1993. Five USTs, as well as all above- and below-ground structures were removed from this former gasoline station on October 27, 1992, by EnviroPro Inc. The USTs included an 8,000-gallon unleaded gasoline UST, a 6,000-gallon super unleaded gasoline UST, a 5,000-gallon regular gasoline UST, a 4,000-gallon diesel UST, and a 550-gallon waste oil UST. Following removal, a plume of oil-affected soil was present below the former waste oil tanks, and a plume of

gasoline-affected soil was present below the former fuel product line. All contaminated soil, except for what was described as a small pocket of diesel-impacted soils at 15 feet below grade were excavated. Hydrocarbons in the residual impacted soils were detected at 250 parts per million (ppm). Based on the results of the confirmation sampling, the Los Angeles Fire Department (LAFD) issued a No Further Action letter on August 23, 1993. However, soil vapor was not sampled and may represent a vapor intrusion risk.

- Firestone Complete Auto Care, located at 6110 West Manchester Avenue, immediately east of the Project Site is listed in the regulatory database as a Historical Hazardous Substance Storage Container site for historically managing a tank of unknown size, contents, location and configuration (aboveground storage tank (AST), UST, sump, clarifier). Waste streams generated at the property have included unspecified solvent mixture, liquids with halogenated organic compounds less than or equal to 1,000 milligrams per liter, oil/water separation sludge, and unspecified organic liquid mixture. Multiple violations were issued by the LAFD for failure to implement best management practices and remain in compliance for hazardous material management. The use of halogenated liquids, the unknown presence of subsurface features, and the history of violations represents a vapor encroachment concern for the subject property.

Based on the above, Partner Engineering and Science, Inc. recommended a subsurface investigation be conducted to determine whether the current or historical operations of the Project Site and neighboring site have impacted the subsurface at the Project Site. The subsurface investigation was conducted as a part of the Phase II ESA, included as Appendix G.2 of this SCEA. As discussed therein, soil and soil gas samples were collected in the areas of concern and along the eastern boundary to evaluate whether soil and soil vapor beneath the Project Site have been impacted by current and/or historical operations at the Project Site and/or the east-adjacent property. The results of the current soil investigation revealed no detections of VOCs, TPH carbon chains, PCBs, or SVOCs above their respective laboratory reporting limits or the screening levels for residential and commercial/industrial land use scenarios in soil. Metals were detected within the background levels in the soil samples analyzed and did not exceed the screening levels for either residential or commercial/industrial land use scenarios. Tetrachloroethylene (PCE) was detected in 20 of the 39 soil gas samples at concentrations ranging from 20 micrograms per cubic meter (µg/$m^3$) to 40 µg/$m^3$, which are below the residential and commercial/industrial soil gas screening levels (SGSLs) of 460 µg/$m^3$ and 4,000 µg/$m^3$, respectively. Ethylbenzene, m&p-xylene, and o-xylene were detected in one (1) of the 39 soil gas samples exceeding the residential and/or commercial/industrial sub-slab/soil gas screening levels at SVP10—15 feet near the former 10,000-gallon carbon steel UST in the northwestern corner of the Project Site. However, ethylbenzene, m&p-xylene, and o-xylene were not detected above their respective laboratory reporting limits in the three deeper soil gas samples collected from SVP16—30 feet, SVP16—40 feet, and SVP16—50 feet next to soil boring SVP10. Additionally, ethylbenzene, m&p-xylene, and o-xylene were not detected above their respective residential or commercial/industrial sub-slab/soil gas screening levels in any other soil gas samples. The detection of VOCs in soil gas from boring SVP10 has been vertically and laterally delineated and is likely attributed to localized residual impacts from the former UST in the northwest corner of the Project Site.

Due to the relatively low concentrations of VOCs detected in soil gas throughout the Site, the Site development plan that includes excavation and removal of soil where vapor impacts were identified, and the construction of at least one level of ventilated subterranean parking across the entire footprint of the Site, subsurface impacts do not appear to present vapor intrusion risks for the Site's current commercial use or the Project's proposed residential/commercial uses at-grade and at upper levels of

the Site. It is anticipated that some residual soil impacts may be encountered during grading and excavation activities. Therefore, Project Mitigation Measure MM-HAZ-1 is proposed, which would require a Soil Management Plan (SMP) be prepared and implemented during earthwork activities.

The Phase I ESA identified three additional items related to the Project Site that while not considered RECs could be a potential concern to the Project Site. Specifically, the existing Pep Boys Automotive Center is equipped with an aboveground oil water tank; however, based on the nature of the use and above-ground visibility, the tank is not expected to represent a significant environmental concern. Additionally, the Pep Boys Automotive Center is equipped with multiple in-ground hydraulic lifts; however, based on their age, they should not contain PCBs. Small releases from this equipment are not likely to require reporting to local agencies, but any impacted soils may require special handling if they become impacted. Lastly, as discussed further below, based on the age of the building located at 6136 West Manchester, asbestos-containing materials (ACMs) and lead-based paints (LBPs) may be present. An asbestos study prepared for the Project Site, dated July 1996, identified, sampled, and quantified 13 homogeneous materials. Six of these homogeneous materials (vinyl flooring tile mastic throughout the sales area, linoleum sheeting in the storage area, the flooring [three layers] in the breakroom, and the black penetration mastic) tested positive for ACMs. A trace amount of asbestos was detected in the plaster material. Compliance with relevant regulations and requirements would ensure Project construction activities would not exacerbate the risk of upset and accident conditions associated with ACMs.

Based on the above, in addition to compliance with regulatory requirements, Project Mitigation Measure HAZ-MM-1 which address specific site conditions, would be implemented to further 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, no evidence of existing underground storage tanks (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.

As discussed above, three aboveground storage tanks (ASTs) for the storage of waste oil, oily water, and waste antifreeze were observed on the Project Site. The ASTs are located on the northwestern portion of the Pep Boys Auto Shop. The ASTs are equipped with secondary containment and appear to be in good condition with minimal staining.

Based on the above, with compliance with applicable regulations and requirements, Project construction activities would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

### Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in

ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, a building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. Based on the age of the on-site structures, ACMs may be present on-site. An asbestos study prepared for the Project Site, dated July 1996, identified, sampled, and quantified 13 homogenous materials. Six of these homogeneous materials (vinyl flooring tile mastic throughout the sales area, Linoleum sheeting in the storage area, the flooring (three layers) in the breakroom, and the black penetration mastic) tested positive for ACMs. A trace amount of asbestos was detected in the plaster material. Pursuant to SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), an asbestos survey would be conducted prior to demolition activities, subject to approval by the LADBS. In the event that ACMs are found, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable federal, state, and local regulations. If required, the Project Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to the SCAQMD and LAFD for review and approval. Thus, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

### Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site structures, LBP may be present on-site. In the event that LBP is found on-site, suspect materials would be managed in accordance with applicable procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. If required, the Project Applicant shall submit a Hazardous Building Materials Demolition Assessment and Management Plan to LAFD for review and approval. 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

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. During site reconnaissance, potential PCB-containing equipment was observed, including one pad-mounted outdoor transformer. No staining or leaking was observed in the vicinity of the transformer. In addition, as discussed above, while the existing Pep Boys is equipped with multiple in-ground hydraulic lifts located within the 10-bay garage, based on their age, they should not contain PCBs. Notwithstanding, in the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. Therefore, with compliance with applicable regulations and requirements, the Project would not exacerbate reasonably foreseeable upset and accident conditions associated with PCBs.

### Oil Wells and Methane

A review of the State of California Geologic Energy Management Division (CalGEM) Well Finder determined that no oil fields or oil wells are located within a 2,000-foot radius of the Project Site.[121] In addition, the Project Site is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS.[122] 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 involve the routine use of small quantities of potentially hazardous materials typical of residential and commercial uses, including cleaning products, paints, and those used for landscape maintenance. All hazardous materials present on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law and Federal Occupational Safety and Health Act and California Occupational Safety and Health Act. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

### Risk of Upset from Recognized Environmental Conditions and Other Site Conditions

The Project Site was identified on the California Environmental Reporting System Hazardous Waste Sites (CERS HAZ), Construction and Demolition Debris Recyclers (C&D DEBRIS RECY), Resources Conservation and Recovery Act—Small Quality Generators (RCRA-SQG), Statewide Environmental Evaluation and planning System for Underground Storage Tanks (SWEEPS UST), Los Angeles County Certified Unified Program Agency (CUPA), Facility Registry Service/Facility Index (FINDS/FRS), Historical Hazardous Substance Storage Container (HIST TANK), Los Angeles–City of Los Angeles Hazardous Materials Management (HAZMAT), Hazardous Waste Manifest Data (HAZNET), Historical Hazardous Substance Storage Information Database (HHSS), and Historical Hazardous Waste Manifest Data (HIST MANIFEST). However, as discussed further below, the listings are not expected to represent a significant environmental concern. 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 associated with RECs and other site conditions.

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[121] *CalGEM, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/, accessed May 15, 2024.*

[122] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011.*

### Underground and Aboveground Storage Tanks

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

### 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 Paint

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, as discussed above, the Project is not located within a recognized Methane Hazard Zone or Methane Buffer Zone as mapped by ZIMAS.[123] Thus, operation of the Project would not exacerbate environmental hazards relative to oil wells or methane.

## Mitigation Measures

The following mitigation measure is provided to reduce Project impacts related to the release of hazardous materials into the environment:

**HAZ-MM-1:** A Soil Management Plan (SMP) will be developed and implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility in accordance with all applicable regulatory requirements.

[123] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011.*

- The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- As part of the SMP, a registered environmental professional, and/or his/her designee, in his or her reasonable discretion, shall be present on the Project Site during grading and excavation activities and shall be on call at other times to monitor compliance with the SMP.

***Based on the above, with adherence to regulatory requirements and implementation of Project Mitigation Measure HAZ-MM-1, 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. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**Less Than Significant Impact.** There are no existing schools located within a 0.25-mile radius of the Project Site. The nearest existing school to the Project Site is Visitation Catholic School, located approximately 0.75 mile west of the Project Site. The Project Site is located approximately 0.16-mile southwest of a proposed school (Charter Middle School), located at 8540 South La Tijera Boulevard. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. ***As such, the use of such materials would not create a significant hazard to existing or proposed schools located within a 0.25-mile radius of the Project Site, and impacts would be less than significant.***

**d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?**

**Less Than Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. The Phase I ESA for the Project Site obtained a database search report from Environmental Data Resources, Inc. (EDR), which is included as Appendix

G.1 of the Phase I ESA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. These findings are summarized below.

### 6136 West Manchester

6136 West Manchester was identified on the standard environmental government sources, including CERS HAZ, C&D DEBRIS RECY, RCRA-SQG, SWEEPS UST, CUPA, FINDS/FRS, HIST TANK, HAZMAT, HAZNET, and HHSS.

The databases listed above are associated with the quantities of hazardous waste generated by motor vehicle repair, motor body work and paint, and motor interior repair and maintenance services provided by the auto shop since 2013. Additionally, the Project Site was identified as a chemical storage facility and hazardous waste generator based on the previous uses, which included motor vehicle repair, motor body work and maintenance. The Project Site historically managed a 10,000-gallon carbon steel UST for Standard Brands Paint and was previously listed on the HAZNET database from 1996 to 2000 for the recycling of organic liquids with halogen. No violations, spills, or releases were reported; therefore, the listings are not expected to represent a significant environmental concern.

### 8651 South La Tijera

8651 South La Tijera was identified on the standard environmental government sources, including HAZMAT, HAZNET, HIST MANIFEST, UST, and SWEEPS UST. The Project Site previously conducted gasoline service station operations and maintained 2.5 tons of unspecified oil-containing waste in 1992. The Project Site also managed five USTs ranging from 500 to 8,000 gallons. The tanks are listed as inactive and historical; therefore, the listings are not expected to represent a significant environmental concern.

***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.** The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The Project is, however, located approximately 1.5 miles from the Los Angeles International Airport (LAX). Based on a report published by LAX, the Project Site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project Site.[124] Additionally, the Project Site is also located outside of the LAX Airport Influence Area, per the County's A-Net mapping system.[125] Thus, the Project would not expose people residing or working in the project

[124] *Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map.*

[125] *County of Los Angeles, A-NET Mapping Application, https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a, accessed June 23, 2024.*

area to excessive airport-related noise levels. ***Therefore, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. No impact would occur.***

**f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would be confined to the Project 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 Project's Construction Management Plan, as outlined in Project Design Feature TR-PDF-1 below. The Construction Management Plan would ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access to and in the Project Site vicinity. ***Therefore, the construction and operation of 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, and impacts would be less than significant.***

**g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** The Project Site is located in an urbanized area without wildlands in its vicinity. In addition, the Project Site is not located within a City-designated VHFHSZ.[126] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. ***Therefore, Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and no impacts would occur.***

**Cumulative Impacts**

**Less Than Significant Impact.** Development of the Project in combination with the seven related projects listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA has the potential to increase the risk of an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, and would be required to comply with all applicable local, state, and federal laws, rules and regulations, as discussed above for the Project. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. **Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific**

[126] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" of the Los Angeles General Plan Safety Element.*

**recommendations for the related projects and the Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

# 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 Mitigation Measure PMM HYD-1 from the 2020–2045 RTP/SCS PEIR, 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 permit 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 from the 2020–2045 RTP/SCS PEIR, 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, Mitigation Measure PMM HYD-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of 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***

Consistent with Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR, although not anticipated, should the Project require temporary or permanent dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, 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.

These regulatory compliance measures would be equal to or more effective than Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM HYD-2 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure HYD-3 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM HYD-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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. While compliance with the various municipal regional stormwater permits (MS4s) is required by law, not all areas are necessarily covered under a permit. For those areas that are not covered under a municipal stormwater permit (MS4), such measures may include the following or other comparable measures identified by the lead agency:

a) Implement best management practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.

b) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.

c) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.

d) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.

e) 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 stormwater runoff discharge permits, on new facilities.

f) 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 stormwater 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.

g) 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.

h) 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.

i) Encourage low-impact development 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 Mitigation Measure PMM HYD-1 from the 2024–2050 RTP/SCS PEIR, 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 permit 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 from the 2024–2050 RTP/SCS PEIR, 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, Mitigation Measure PMM HYD-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

**PMM HYD-2:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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 comply with appropriate building codes and standard practices including the CBC.

b) Maximize, where practical and feasible, permeable surface area to protect water quality and allow for groundwater recharge. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.

c) Avoid construction and siting on groundwater recharge areas, where feasible, to prevent conversion of those areas to impervious surface. .

***Applicability to the Project***

Consistent with Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR, although not anticipated, should the Project require temporary or permanent dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. In addition, 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. These regulatory compliance measures would be equal to or more effective than Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM HYD-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**PMM HYD-3:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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. In areas affected by coastal flooding, new projects should be designed for resilience against 3.5 feet of sea-level rise, as per California Ocean Protection Council's strategic guidance. 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, Mitigation Measure HYD-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

*The following analysis is based, in part, on the 6136 West Manchester Avenue: Water Resources Report (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated October 2024 and included as Appendix H of this SCEA.*

**a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less Than Significant Impact.** As demonstrated by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

### Surface Water Quality

#### Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As Project construction would disturb more than one acre of soil, the Project would be required to retain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) with the State, which would specify BMPs and erosion control measures to be used during construction of the Project to manage runoff flows and prevent pollution. The Project would be required by the City of Los Angeles to put in place an erosion control plan for the full duration of Project construction activities. The NPDES and SWPPP measures would be designed to contain and treat, as necessary, stormwater and construction watering for dust reduction on the Project Site to prevent runoff from impacting off-site drainage facilities or receiving waters. BMPs could include, but not be limited to, sandbag barriers, inlet protection, regular street sweeping, controlled entrance/exit with rumble plates, dust control, and designated staging areas for materials and equipment. Site-specific BMPs, which will be implemented when construction commences, prior to site clearing and grubbing or demolition activities, would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Therefore, with compliance with NPDES requirements, including site-specific BMPs, and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant.

#### Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for at least the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, trash, bacteria, nutrients, organics, pesticides, and metals. The implementation of BMPs as required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Thus, impacts to surface water quality during operation of the Project would be less than significant.

### Groundwater Quality

#### Construction

Construction activities for the Project would include demolition of existing buildings and surface parking areas and excavation to a depth of 35 feet bgs. As provided in the Geotechnical Investigation included as Appendix E.2 of this SCEA, the subsurface exploration encountered a water seep at a depth of 35 feet in one boring. It is anticipated that due to the presence of water in only one hole of the explorations, that the encountered water is a water seep and not a static groundwater level. In addition, based on review of the California Department of Conservation Division of Mines and Geology Hazard Zone Report[127] for the Project Site, the historic high groundwater level for the Project Site was 40 feet below the ground surface. Thus, groundwater is not expected to be encountered during construction that would require either temporary or permanent dewatering operations. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Other potential effects to groundwater quality could result from the presence of an UST or during the removal of a UST. As discussed above, under Item IX, Hazards and Hazardous Materials, there were USTs associated with the Project Site; however, the USTs and the impacted soil in question have since been removed and disposed off-site. Moreover, all proposed soil removal from the Project Site would be performed pursuant to a SMP required by Mitigation Measure HAZ-MM-1. Therefore, USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166, as well as removal and handling protocols identified in the SMP required by Mitigation Measure HAZ-MM-1. Therefore,

[127] *USGS, Seismic Hazard Zone Report for the Venice 7.5-minute Quadrangle, 1998.*

compliance with existing regulations and applicable mitigation measures would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

### Operation

Operational activities that could affect groundwater quality include spills of hazardous materials. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. As discussed above, there are records of USTs associated with what is now the Project Site. In addition, the USTs and the impacted soil in question have since been removed and disposed off-site. Additionally, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. The Project would also comply with all applicable existing regulations that 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. Furthermore, as previously discussed, the Project would implement a SMP required by Mitigation Measure HAZ-MM-1 to ensure all on-site contaminated soil is properly disposed of. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements.

As described above, the Project would include the installation of LID BMPs to treat and dispose of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event prior to discharging the streets in the public right-of-way. The Project also does not include the installation or operation of water wells, or any extraction or recharge system. Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality, and impacts will be less than significant.

***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. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Less Than Significant Impact.** No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells.

Development of the Project would include excavations to a maximum depth of 35 feet below ground surface. As provided in the Geotechnical Investigation included as Appendix E.2 of this SCEA, the subsurface exploration encountered a water seep at a depth of 35 feet in one boring. It is anticipated that due to the presence of water in only one hole of the explorations, that the encountered water is a water seep and not a static groundwater level. In addition, based on review of the California Department of Conservation Division of Mines and Geology Hazard Zone Report[128] for the Project Site, the historic high groundwater level for the Project Site was 40 feet below the ground surface. Therefore, groundwater is not expected to be encountered during construction that would require either temporary or permanent dewatering operations. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements. Therefore, 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.

Regarding groundwater recharge during operation, the Project would develop hardscape and structures that would cover the majority (100-percent) of the Project Site with impervious surfaces. However, as previously discussed, the Project would include the installation of LID BMPs, which would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

***Overall, 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.***

**c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**i. Result in substantial erosion or siltation on or off-site;**

**Less Than Significant Impact.** Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These

[128] *USGS, Seismic Hazard Zone Report for the Venice 7.5-minute Quadrangle, 1998.*

activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant.

No streams or rivers are located on or within the immediate vicinity of the Project Site. As previously discussed, at buildout of the Project, the Project Site would be comprised of approximately 100-percent impervious areas. Accordingly, there would be a limited potential for erosion or siltation to occur from exposed soils. The Project would include BMPs that would address drainage flows and would ensure that substantial soil erosion or siltation does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

***Overall, 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.** As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General

Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant.

As provided in the Hydrology Report, at buildout of the Project, the Project Site would be comprised of approximately 100-percent impervious areas. As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions (from approximately 5.35 cubic feet per second to 5.31 cubic feet per second). Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site. Thus, operational impacts to flooding would be less than significant.

***Overall, with 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.** As discussed above, at buildout of the Project, the Project Site would be comprised of approximately 100-percent impervious areas. The Project Site currently does not have BMPs for the management of pollutants or runoff. Implementation of Project BMPs would control stormwater runoff and could ultimately result in a minor decrease in runoff compared to existing conditions (from approximately 5.35 cubic feet per second to 5.31 cubic feet per second). In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. ***Consequently, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.***

**iv. Impede or redirect flood flows?**

**No Impact.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[129,130] ***Thus, the Project would not impede or redirect flood flows, and no impact would occur.***

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[129] *Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1760F, effective September 26, 2008.*

[130] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-7, Mapped Flood Hazards Areas in West Los Angeles APC, p. 10-14.*

**d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?**

**Less Than Significant Impact.** As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City.[131,132] In addition, the City does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the City's Hazards Mitigation Plan, the Project Site is not located within a flood impact zone or located near a dam.[133] Therefore, the risk of flooding from inundation by dam failure is considered low. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Therefore, in the unlikely event of inundation of the Project Site, the Project would not result in a discharge of pollutants. Impacts would be less than significant.

***Overall, the Project would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.***

**e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less Than Significant Impact.** Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL).

The Project Site lies within the Ballona Creek Watershed and other urban watersheds. Constituents of concern listed for Ballona Creek and other urban watersheds under California's Clean Water Act Section 303(d) List include PCBs, trash, mercury, arsenic, and dichlorodiphenyltrichloroethane. As discussed above, during construction, the Project would be required to implement a SWPPP that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, the implementation of BMPs required by the City's LID Ordinance during Project operation would target pollutants that could potentially be carried in stormwater runoff. As such, construction and operation of the Project would not introduce new pollutants or an increase in pollutants that could conflict

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[131] *Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1760F, effective September 26, 2008.*

[132] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-7, Mapped Flood Hazards Areas in West Los Angeles APC, p. 10-14.*

[133] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 12-2, Mapped Tsunami Inundation Area in West Los Angeles APC, p. 12-5.*

with or obstruct any water quality control plans for the Ballona Creek Watershed and other urban watersheds.

With regard to potential impacts associated with groundwater management, as discussed above in Response to Checklist Question X.a., of this SCEA, the Project would not expand any potential areas of contamination, increase the level of groundwater contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

***Overall, based on the above, 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**

**Less Than Significant Impact.** The related projects comprise a variety of uses, including residential, commercial/retail, hotel, industrial, mixed-use, and institutional uses. The Project and these related projects, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would reduce impacts to a less than significant level. Furthermore, the Project would not result in any water quality related impacts and would not increase peak stormwater flows from the Project Site. ***Therefore, the Project would not contribute to cumulative impacts regarding hydrology and water quality.***

# 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 and Planning Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 from the 2020–2045 RTP/SCS PEIR 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 and Planning Threshold (b) below, the Project would not physically divide an established community or create a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or

mitigating an environmental effect. Therefore, Mitigation Measure PMM LU-2 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 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 connections in communities that have been physically divided through 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 and Planning Threshold (a) below, the Project would not physically divide an established community. Therefore, Mitigation Measure PMM-LU-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**PMM LU-2:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects that are due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as applicable and feasible. 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, measures may include the following or other comparable measures identified by the lead agency:

a) Modify the transportation or land use project to eliminate or reduce 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 and process said amendment.

***Applicability to the Project***

As outlined in the impact analysis under Land Use and Planning Threshold (b) below, the Project would not create a significant environmental impact due to a conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Mitigation Measure PMM LU-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

***Impact Analysis***

**a. Would the project physically divide an established community?**

**No Impact.** The Project Site is generally bounded by Manchester Avenue to the north, La Tijera Boulevard to the southeast, and Truxton Avenue to the southwest. The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking.

As discussed in Section 3, Project Description, of this SCEA, the Project includes the development of a new approximately 416,915-square-foot building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. To accommodate the proposed uses, the existing commercial structures, totaling 21,911 square feet, would be removed. The Project would be constructed within the boundaries of the Project Site and the proposed uses would be located within a single 8-story building with a maximum height of 96 feet. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. ***Therefore, the Project would not physically divide an established community, and no impact would occur.***

**b. Would the project 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.** The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

A project is considered consistent with the provisions and general policies of applicable City or regional land use plan and regulation if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals.[134] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match

[134] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th.704, 719.*

between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of SCAG's 2020–2045 and 2024–2050 RTP/SCS, the City's General Plan (including the Framework Element, the Housing Element, Conservation Element, and Mobility Plan 2035), the Westchester–Playa Del Rey Community Plan, Downtown Westchester CDO District, Los Angeles Coastal Transportation Corridor Specific Plan, and the LAMC, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

### Southern California Association of Governments

#### 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

The Project's general consistency with the applicable goals and strategies of the 2020–2045 RTP/SCS is discussed in Table 17 on page 246.

As detailed therein, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing a new mixed-use development that would include residential and commercial uses on a Project Site within a SCAG-designated HQTA and City-designated TPA that is well served by public transit. As previously discussed, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces) in accordance with LAMC requirements and enhance pedestrian activity adjacent to the Project Site by developing an active ground floor commercial space and installing extensive landscaping. The Project would also be designed with LEED Silver or equivalent green building standards and would provide parking spaces that are equipped with EV charging stations and additional spaces capable of supporting future EVSE. As such, the Project would support the reduction in greenhouse gas emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, public transit) and reduce dependency on single-occupancy vehicles. Therefore, the Project would not conflict with the applicable goals of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

#### 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy

The Project's general consistency with the applicable policies set forth in the 2024–2050 RTP/SCS is discussed in Table 18 on page 251. As detailed therein, the Project would not conflict with the applicable policies set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the policies of the 2024–2050 RTP/SCS to: pursue the development of Complete Streets, first-mile connections and multi-modal connectivity; improve transportation safety and eliminate transportation-related

**Table 17**
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

| Goal/Strategy[a] | Analysis of Project Consistency |
|---|---|
| **Goal 2:** Improve mobility, accessibility, reliability, and travel safety for people and goods.<br><br>**Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system.<br><br>**Goal 4:** Increase person and goods movement and travel choices within the transportation system. | **No Conflict.** The Project Site is located in an urbanized area within the City of Los Angeles 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 several bus lines operated by the Metro, Culver CityBus, LADOT CE, and Santa Monica BBB. The Project would replace the existing commercial uses on the Project Site with a new mixed-use development that would include residential and commercial uses. Locating the Project and the proposed uses within an urbanized area with an established network of streets and highways as well as various transit options would facilitate mobility and accessibility to and from the Project Site for residents of the Project. In addition, the Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would also would incorporate pedestrian alert safety signs at driveways and walking paths within the parking garage as well as mirrors in areas of pedestrian/automobile interface, if needed, to improve visibility. The driveways would be designed to maximize sight distance and visibility to minimize potential vehicle-bicycle and vehicle-pedestrian conflicts. The Project would also provide long-term and short-term bicycle parking spaces in accordance with LAMC requirements. Furthermore, the Project does not include any design features that could pose safety issues to travelers. Thus, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of other alternative modes of travel, including convenient access to public transit. Thus, the Project would not conflict with these goals. |
| **Goal 5:** Reduce greenhouse gas emissions and improve air quality.<br><br>**Goal 6:** Support healthy and equitable communities.<br><br>**Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network. | **No Conflict**. As discussed under Item XVII, Transportation, the Project would improve bicycle and pedestrian infrastructure, which would be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the Project area, thereby facilitating a reduction in VMT and GHG emissions and improved air quality to contribute to the protection of the environment and support healthy and equitable communities, as well as support the goal of adapting to a changing climate and supporting an integrated regional development pattern and transportation network. As evaluated under Item III, Air Quality, operation of the Project would result in less than significant impacts related to air quality, and short-term construction impacts related to regional construction emissions would be reduced to less than significant levels. As identified in Section 3, Project Description, and Item VIII, Greenhouse Gas Emissions, the |

**Table 17 (Continued)**
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

| Goal/Strategy[a] | Analysis of Project Consistency |
|---|---|
| | Project would include energy conservation, water conservation, and waste reduction features that would support and promote environmental sustainability. The Project would also comply with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. With implementation of regulatory requirements and sustainability features, impacts related to air emissions, which directly relate to the environment and the health of the City's residents, would be less than significant. In addition, the Project Site's location within an HQTA, and thus, within close proximity to a variety of public transit options, would further support healthy and equitable communities. The Project's mix of uses, pedestrian-friendly design, and provision of bicycle parking spaces would also promote a healthy community. Thus, the Project would not conflict with these goals. |
| **Goal 8:** Leverage new transportation technologies and data-driven solutions that results in more efficient travel. | **No Conflict.** Although these goals apply at a regional level, as discussed above, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. The Project would promote non-auto travel and reduce the use of single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EV charging stations and additional spaces capable of supporting future EVSE. Therefore, the Project would encourage and support more efficient travel. Thus, the Project would not conflict with this goal. |
| **Goal 9:** Encourage development of diverse housing types in areas that are supported by multiple transportation options. | **No Conflict**. The Project would construct 489 residential and live-work units of various sizes and would also set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations, thereby providing a range of housing opportunities. Furthermore, the Project is within an SCAG-designated HQTA and is supported by multiple transportation options, as discussed above. Thus, the Project would not conflict with this goal. |
| **Goal 10:** Promote conservation of natural and agricultural lands and restoration of habitats. | **No Conflict.** As discussed under Item IV, Biological Resources, the Project Site is located in an urbanized area and contains limited to sparse landscaping in the form of nonnative/non protected trees, hedges, and shrubs. The Project Site is relatively flat with limited ornamental landscaping. Specifically, as previously discussed, there are a total of 61 trees located within and surrounding the Project Site that were identified as part of the Arboricultural Report. Of these, 45 trees would be removed, including 43 on-site trees and two City street trees. However, as provided in the Tree Report included in Appendix A, none of |

**Table 17 (Continued)**
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

| Goal/Strategy[a] | Analysis of Project Consistency |
|---|---|
| | the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrub Ordinance. The Project would provide 79 new on-site trees on the ground floor and on various building levels and would replace any removed street trees in compliance with the City's Urban Forestry Division standards and subject to approval by the Board of Public Works. As this is less than the required 123 trees, the Project utilizes the provisions of Ordinance No. 185,573 to pay an in-lieu fee for the provision of the remainder of the 44 trees to meet the required 123 trees. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Therefore, the Project would not conflict with this goal. |
| **Focus Growth Near Destinations & Mobility Options**<br><br>Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.<br><br>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.<br><br>Plan for growth near transit investments and support implementation of first/last mile strategies.<br><br>Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.<br><br>Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.<br><br>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).<br><br>Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking). | **No Conflict**. The Project would construct 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The proposed development would locate a mix of uses that, along with other development in the area, would serve as a shopping, dining, and gathering destination. The Project would also provide secure bicycle parking and easy bicycle accessibility to the Project Site to encourage alternative mobility for residents, employees, and visitors to the Project Site. Furthermore, the Project would provide housing and jobs near transit. The Project Site is also served by a variety of transit options provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 102 and 115 along Manchester Avenue with connections from the 102 to the Metro E Line (Expo Line) at Expo/Western, Expo/Vermont, and Expo Park/USC; LADOT CE Route 574; Culver City Line 6 Bus; Culver City Rapid 6 Bus; and Santa Monica BBB Route 3 and Rapid 3 along Sepulveda Boulevard. Thus, the Project would not conflict with this land use strategy. |
| **Strategy: Promote Diverse Housing Choices** | **No Conflict**. The Project would construct 489 residential and live-work units of various sizes and would also set aside |

**Table 17 (Continued)**
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

| Goal/Strategy[a] | Analysis of Project Consistency |
|---|---|
| | 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations, thereby providing a range of housing opportunities. Thus, the Project would not conflict with this land use strategy. |
| **Leverage Technology Innovations**<br><br>Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. | **No Conflict.** The Project would provide secure bicycle parking and easy bicycle accessibility mobility for employees and visitors to the Project Site. Specifically, the Project would provide 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). Additionally, the Project would provide electric vehicle charging stations and electric vehicle supply wiring consistent with City requirements. Therefore, the Project would not conflict with this land use strategy. |
| **Support Implementation of Sustainability Policies**<br><br>Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. | **No Conflict**. While this is a citywide strategy, the Project would support it. The Project's design is based on smart growth principles and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. Additionally, the Project would incorporate environmentally sustainable design features required by the Los Angeles Green Building Code. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Furthermore, the Project would incorporate additional sustainable features including high efficiency plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and water-efficient landscape design. The Project would also comply with the City's EV charging requirements. In addition, the new residential units would be equipped with high efficiency toilets and low-flow showerheads. Therefore, the Project would not conflict with this land use strategy. |
| **Promote a Green Region**<br><br>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.<br><br>Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.<br><br>Promote more resource efficient development focused on conservation, recycling and reclamation. | **No Conflict.** The Project's location, land use characteristics, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. 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 CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, improve climate resiliency and reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Sustainability features include, but would not be limited to: use of environmentally-friendly building materials such as non-toxic paints; high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor |

**Table 17 (Continued)**
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

| Goal/Strategy[a] | Analysis of Project Consistency |
|---|---|
| | and outdoor water use; Energy Star–labeled appliances; and drought tolerant planting. Some of these measures are consistent with the requirements of the Los Angeles Green Building Code, while some exceed code requirements. These measures would also support resource efficiency by conserving water and energy. Therefore, the Project would not conflict with these land use strategies. |

[a] *Southern California Association of Governments, 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal), adopted September 3, 2020.*

*Source: Eyestone Environmental, 2024.*

fatalities/serious injuries; encourage residential and commercial development close to transit; encourage alternatives to single-occupancy vehicle travel (e.g., trips made by foot, bikes and transit); promote future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities; encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region; encourage housing in transit-supportive and walkable areas to create more interconnected and resilient communities; support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region; promote 15-minute communities; and promote sustainable development (including sustainable energy and water use) and reduce VMT. Therefore, the Project would not conflict with the applicable policies of the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

**Table 18**
**Consistency with Applicable Policies of the 2024–2050 RTP/SCS**

| Policies | Would the Project Conflict? |
|---|---|
| **Policy 03:** Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities sing a variety of modes (e.g., people walking, biking, rolling, driving, taking transit).<br><br>**Policy 04:** Ensure the implementation of Complete Streets that are sensitive to urban, suburban, or rural contexts and improve transportation safety for all, but especially for vulnerable road uses (e.g., people, especially older adults and children, walking and biking.<br><br>**Policy 05:** Facilitate the implementation of Complete Streets and curb space management strategies that accommodate and optimize new technologies, micromobility devices and first/last mile connections to transit and last-mile delivery.<br><br>**Policy 07:** Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.<br><br>**Policy 22:** Eliminate transportation-related fatalities and serious injuries (especially those involving vulnerable road users, such as people, especially older adults and children, walking and biking) on the regional multimodal transportation system. | **No Conflict.** Although these policies apply at a regional level, Project development would support SCAG's and the City's goals to develop Complete Streets. The Project would be implemented within an existing urbanized area served by an established network of roads and freeways that provide local and regional access to the area, including the Project Site, and that include pedestrian amenities (sidewalks and crosswalks) as well as bicycle amenities. The design of the Project would comply with all City access and circulation requirements, which may affect public ROWs, including proper driveway alignment, sidewalk widths, and design that would not hinder sight distance, mobility, or accessibility.<br><br>Adjacent to the Project Site, La Tijera Boulevard and Manchester Avenue require a 55-foot half-right-of-way. Truxton Avenue requires a 43-foot half-right-of-way. Under existing conditions, Truxton Avenue and La Tijera Boulevard provide 12-foot wide sidewalks and parkways, and Manchester Avenue provides an eight-foot wide sidewalk. The Project would provide five-foot dedications along Manchester Avenue and La Tijera Boulevard expanding the sidewalk widths adjacent to the Project Site to 13 feet and 17 feet to meet the right-of-way widths required by the Mobility Plan. All other street frontages currently meet the Mobility Plan standards.<br><br>At the same time, the Project would provide pedestrian improvements (i.e., new/widened sidewalks, street trees, and landscaping within and adjacent to the Project Site), all in accordance with ADA requirements, to enhance pedestrian, bicycle, transit, and vehicular circulation and safety. The access point on La Tijera Boulevard would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. The Project would also be developed on an urban infill site within a TPA in close proximity to transit which would facilitate and encourage transit use, and would provide on-site bicycle parking in accordance with LAMC requirements, which would facilitate and encourage bicycle use. Hence, the Project would facilitate first/last mile connections.<br><br>La Tijera Boulevard is designated as a Pedestrian Enhanced Network (PEN) by the Mobility Plan. As discussed above, the Project design includes pedestrian enhancements, including new/widened sidewalks, walkways, and street trees, and landscaping within and around the Project Site. Additionally, Manchester Avenue has been identified as part of the Bicycle Enhanced Network and La Tijera Boulevard has been identified as part of the Bicycle Lane Network by the Mobility Plan. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. In fact, the existing |

**Table 18 (Continued)**
**Consistency with Applicable Policies of the 2024–2050 RTP/SCS**

| Policies | Would the Project Conflict? |
|---|---|
| | driveways on Manchester Avenue, a designated street within the BEN, would be removed and the two existing driveways on Truxton Avenue and La Tijera Boulevard would be replaced by a single new driveway on each street. These measures would promote active transportation modes such as biking and walking and would enhance safety for other users of these streets. Lastly, the Project Site is not located adjacent to, and the Project would not impact, street segments of the City's Vision Zero's High Injury Network. The Project would also not create dangerous curves or create other hazardous driving conditions (for example, by combining automobile and farm equipment traffic). As such, the Project would not have the potential to interfere with Mobility Plan 2035 Complete Streets goals/objectives, reduce first/last mile connections, or increase vehicle-related hazards to pedestrians along a dangerous street.<br><br>Based on the above, the Project would contribute to Complete Streets that provide a safe, multimodal network for people of all ages and abilities using a variety of modes. Therefore, the Project would not conflict with these policies. |
| **Policy 09:** Encourage residential and employment development in areas surrounding existing and planned transit/rail stations. | **No Conflict.** As indicated above, the Project would be developed on an urban infill site within a TPA in close proximity to transit. Specifically, transit options in the vicinity of the Project Site include Metro Local Bus Routes 102 and 115, LADOT CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6, several of which lines provide peak commute hour headways of 15 minutes or less. Therefore, the Project would not conflict with this policy. |
| **Policy 14:** Encourage the development of transportation projects that provide convenient, cost-effective and safe alternatives to single-occupancy vehicle travel (e.g., trips made by foot, on bikes, via transit, etc.)<br><br>**Policy 15:** Encourage jurisdictions and TDM practitioners to develop and expand local plans and policies to promote alternatives to single occupancy vehicle travel for residents, workers and visitors. | **No Conflict.** Regarding consistency with Policy 14, see the consistency analysis for Policies 3, 4, 5, 7 and 9 above.<br><br>Regarding consistency with Policy 15, the Project would include a mix of residential, retail, and restaurant uses in an area well served by public transit. The Project would also promote pedestrian activity through building design and streetscape amenities that would provide better connections to transit stops. The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. In addition, the Project would incorporate several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site.<br><br>Based on the above, the Project would not conflict with these policies. |
| **Policy 32:** Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and | **No Conflict.** The Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, which is already served by fully developed street and utility infrastructure systems. |

**Table 18 (Continued)**
**Consistency with Applicable Policies of the 2024–2050 RTP/SCS**

| Policies | Would the Project Conflict? |
|---|---|
| planned urban infrastructure that includes transit and utilities.<br><br>**Policy 33:** Promote the growth of origins and designations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicles (SOV) dependency and vehicle miles traveled.<br><br>**Policy 35:** Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region. | No new roads and no extension of existing roads would be required to serve the Project. As indicated under Item XIX, Utilities and Service Systems, the Los Angeles Department of Water and Power (LADWP) and the City Department of Public Works, Bureau of Sanitation (LASAN) would have the capacity to serve the Project with regard to water/energy infrastructure and wastewater/solid waste, respectively.<br><br>In addition, as previously indicated, the Project would be developed in a SCAG-designated HQTA and City-designated TPA in close proximity to employment, destinations, and other neighborhood services. Furthermore, the Project would include pedestrian improvements and bicycle parking facilities, and as indicated under Item XVII, Transportation, the Project would result in lower household VMT per capita and work VMT per employee compared to the average for the West Los Angeles Area Planning Commission (APC).<br><br>Lastly, rather than displacing existing housing or a substantial number of existing jobs, the Project would replace existing commercial uses and surface parking areas with 489 new residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space (resulting in a net increase in on-site jobs), thereby furthering fair housing access and equity in the community. Therefore, the Project would not conflict with these policies. |
| **Policy 36:** Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities. | **No Conflict.** See the consistency analysis for Policies 09, 14 and 15 above (i.e., the Project would include new housing development in a transit-supportive area). In addition, the Project would include streetscape improvements and ground level commercial uses, which would encourage walkability and interconnectivity with adjacent land uses. Therefore, the Project would not conflict with this policy. |
| **Policy 37:** Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.<br><br>**Policy 38:** Prioritize communities that are vulnerable to displacement pressures by supporting community stabilization and increasing access to housing that meets the needs of the region. | **No Conflict.** The Project Site does not contain any existing housing. Therefore, rather than displacing existing housing, the Project would replace existing commercial uses and surface parking areas with 489 new residential and live-work units (inclusive of 64 Very Low-Income Households) which would help the City achieve its fair share of SCS-identified regional housing demand (including affordable housing demand). Therefore, the Project would not conflict with these policies. |
| **Policy 42:** Promote 15-minute communities as places with a mix of complimentary land uses and accessible mobility options that align with and support the diversity of places or communities across the region. There are | **No Conflict.** As indicated previously, the Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, in proximity to employment, destinations, and other neighborhood services, and transit. As also indicated |

**Table 18 (Continued)**
**Consistency with Applicable Policies of the 2024–2050 RTP/SCS**

| Policies | Would the Project Conflict? |
|---|---|
| communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses. | previously, the Project would provide streetscape improvements (i.e., new/widened sidewalks, walkways, and street trees, and landscaping within and around the Project Site) that would enhance pedestrian and bicycle connectivity with the surrounding community. Lastly, as evidence that the Project would promote 15-minute communities, as indicated under Item XVII, Transportation, of this SCEA, the Project would result in lower VMT per capita and work VMT per employee compared to the average for the West Los Angeles APC. Therefore, the Project would not conflict with this policy. |
| **Policy 48:** Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.<br><br>**Policy 49:** Support communities across the region to advance innovative sustainable development practices.<br><br>**Policy 67:** Promote sustainable water use planning, practices and storage that improves regional water security and resilience in a drier environment. | **No Conflict.** The Project would consist of a mixed-use development on an already developed urban infill site in a highly developed area of the City, in proximity to employment, destinations, and other neighborhood services, and transit. As such, the Project would promote sustainable development, best practices (i.e., smart growth), resource conservation, and resilience, and would reduce resource consumption, by conserving undeveloped land and reducing traffic, per capita VMT, air emissions, and fuel consumption, etc. The Project would also implement a series of sustainability measures that would further reduce the Project's demand for natural resources and infrastructure capacity, such as: high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. The Project would also incorporate various features required to meet LEED Silver or equivalent certification. The above factors are, in part, the reason that this SCEA concludes that the Project would result in less than significant impacts (either before or after mitigation) in terms of: biological resources (Item IV); energy resources (Item VI); greenhouse gas emissions (Item VIII); traffic, including VMT (Item XVIII); and water resources/supply, sewer infrastructure capacity, and energy infrastructure capacity (Item XX). Therefore, the Project would not conflict with these policies. |
| **Policy 51:** Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts. | **No Conflict.** As evaluated above under Item III, Air Quality, and Item VIII, Greenhouse Gas Emissions, the Project would result in less-than-significant impacts related to air quality and GHG emissions during construction and operation. As discussed under Item VIII, Greenhouse Gas Emissions, all Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated GHG emissions. Additionally, the Project would further support and promote environmental sustainability by complying with regulatory requirements and the sustainability intent of the U.S. Green Building Council's |

**Table 18 (Continued)**
**Consistency with Applicable Policies of the 2024–2050 RTP/SCS**

| Policies | Would the Project Conflict? |
|---|---|
| | LEED Silver or equivalent green building standards. These features include, but would not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; all electric HVAC systems; Energy Star–labeled appliances; and drought tolerant planting. In addition, the Project would meet the Los Angeles Green Building Code Requirements for new parking facilities capable of supporting future EVSE, as well as parking spaces equipped with EV charging stations. These features would reduce GHG emissions and improve air quality. Therefore, the Project would not conflict with this policy. |

[a] *Southern California Association of Governments, 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 20204), adopted April 4, 2024.*

*Source: Eyestone Environmental, 2024.*

## 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. The Project's consistency with the applicable goals, objectives and policies of the General Plan Framework Element is provided in Table 19 on page 256 and summarized below.

**Table 19**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| **General Plan Framework Element** | |
| **Land Use Chapter** | |
| **Goal 3A**: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city. | **No Conflict**. While this is a Citywide goal, the Project's proposed residential and commercial uses would be compatible with the types of uses envisioned for a Commercial Center, described as a focal point of surrounding residential neighborhoods and featuring a diversity of uses, including small offices, overnight accommodations, cultural and entertainment facilities, schools and libraries in addition to neighborhood-oriented uses. Development of the Project would create new employment opportunities during construction and operation, which would support the City's long-term fiscal and economic health. The Project would be consistent with surrounding uses and would be designed to complement existing residential neighborhoods. The Project Site is located along the Sepulveda Boulevard and Manchester Avenue corridors in close proximity to multiple public transit options, which would help reduce traffic congestion and improve air quality through a reduction in the number of vehicles traveling to the Project Site. Furthermore, as detailed under Item XV, Public Services, and under Item XIX, Utilities and Service Systems, the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. In addition, the Project would include extensive open space and landscaping. Thus, the Project would contribute to the achievement of a more livable City. Therefore, the Project would not conflict with this goal. |
| **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 construct 489 residential units of various sizes and would also set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). In addition, the Project would include approximately 16,120 square feet of ground-floor commercial space, including 10,747 square feet of restaurant uses and 5,373 square feet of retail space. The Project would also incorporate a variety of open space and recreational amenities throughout the Project Site to support the needs of Project residents and visitors and to provide new open space opportunities to the public. Therefore, the Project would not conflict with this objective. |
| **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**. While this policy refers to the citywide provision of public infrastructure, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this policy. |
| **Policy 3.1.3:** Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear | **No Conflict**. While this policy relates to citywide provision of open space, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling 51,385 square feet, including approximately 43,235 |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| network of parklands and trails, neighborhood parks, and urban open spaces. | square feet of common open space consisting of approximately 30,830 square feet of exterior common open space and approximately 12,405 square feet of interior common open space; and 8,150 square feet of private open space, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Therefore, the Project would not conflict with this policy. |
| **Objective 3.2**: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.<br>**Policy 3.2.3**: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations. | **No Conflict**. While this is a citywide objective, the Project supports this vision of development. The Project is located in a designated Job Center, TPA, HQTA, and NMA and near a Livable Corridor, thereby promoting sustainability and reducing automobile dependency and VMT, with associated reductions in air quality and GHG emissions. The Project Site is located within close proximity to a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT Commuter Express CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. Furthermore, the Project would provide a total of 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces) for residents and visitors. In addition, the ground floor retail and restaurant uses and pedestrian-scaled improvements proposed by the Project would promote walkability in the vicinity of the Project Site. Therefore, the Project would provide the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, VMT, and air pollution. Therefore, the Project would not conflict with this objective and policy. |
| **Objective 3.3**: Accommodate projected population and employment growth within the City and each community plan area and plan for | **No Conflict**. As discussed under Item XIV, Population and Housing, population and employment growth associated within the Project would be well within SCAG's projections for |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| the provision of adequate supporting transportation and utility infrastructure and public services. | the Los Angeles Subregion, which serve as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. Moreover, as discussed under Item XV, Public Services, and Item XIX, Utilities and Service Systems, the Project would incrementally increase water demand, wastewater generation, solid waste generation, and demand for public services, but would have a less than significant impact on these services and utilities. Therefore, the Project would not conflict with this objective. |
| **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 support this objective as the Project would include the development of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space within an area designated as Community Commercial. The Project would be compatible with the existing neighborhood context and would further support this objective as it is located in an area that is well-served by several transit lines as well as numerous employment and entertainment options. Therefore, the Project would be consistent with this objective. |
| **Objective 3.7:** Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents quality of life can be maintained or improved. | **No Conflict.** The Project would provide for the stability and enhancement of the neighborhood by providing 489 new multi-family units (inclusive of 64 units reserved for Very Low-Income Households) and 16,120 square feet of restaurant and retail uses to serve Project residents and residents in the surrounding area. As discussed for Policy 3.1.2 and Objective 3.2 above, the Project is located within an area with sufficient public infrastructure and services and that is well-served by public transit. Therefore, the Project would be consistent with this objective. |
| **Objective 3.9:** Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime. | **No Conflict.** The Project would construct a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and extensive landscaping. The Project would also provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | roadways, while minimizing light and glare on adjacent properties. Overall, the Project would be compatible with the existing neighborhood context and would further support this objective as it would replace an existing underutilized site with a more desirable place in which to live, work and visit, both in daytime and nighttime. Therefore, the Project would not conflict with this objective. |
| **Objective 3.16:** Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity. **Policy 3.16.2:** Locate parking in pedestrian districts to rear, above, or below the street-fronting use. | **No Conflict.** The Project would provide 549 vehicle parking spaces within two subterranean parking levels and in the first and second levels of the new building. Access to the Project Site would be provided via a two-way driveway along Truxton Avenue and a two-way driveway along La Tijera Boulevard. These driveways would be designed in accordance with the standards set forth in LADOT's Manual of Policies and Procedures to provide sufficient internal queuing space and to ensure safety for pedestrians. Refer to Policy 3.9 above for a discussion of the Project's pedestrian amenities. |
| **Housing Chapter** | |
| **Goal 4A:** An equitable distribution of housing opportunities by type and cost accessible to all residents of the City. | **No Conflict.** The Project would construct 489 residential units of various sizes and would also set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations, thereby providing a range of housing opportunities for the residents of City. Therefore, the Project would not conflict with this goal. |
| **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.** While this is a citywide objective, the Project would support its implementation. Specifically, as discussed in Objective 3.2 and Policy 3.2.3 above, the Project is located in a designated HQTA and NMA and near a Livable Corridor. The Project Site is also located within close proximity to a variety of public transit options, including Metro Local Bus Routes 102 and 115, LADOT Commuter Express CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. Additionally, the Project proposes a zero-foot setback for the residential floor along Manchester Avenue, which allows the Project to provide an appropriate building mass along Manchester Avenue to buffer the residential area across La Tijera Boulevard from the height and mass of the Project. Therefore, the Project would not conflict with this objective. |
| **Open Space and Conservation Chapter** | |
| **Goal 6A:** An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses. | **No Conflict.** While this is a citywide/regional goal, the Project would contribute to the public and private open space system by providing approximately 51,385 square feet of open space, including a 2,345-square-foot ground level plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Overall, the Project's proposed open space would exceed the requirements of the LAMC. Furthermore, the Project would not conflict with or encroach upon the public and private open space system. Therefore, the Project would not conflict with this goal. |
| **Policy 6.4.7:** Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources. | **No Conflict.** While this is a citywide policy, the Project would support its implementation by providing approximately 51,385 square feet of open space. As discussed above, the Project would include a 2,345-square-foot public plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. This on-site open space would serve to reduce the demand on parks and recreational facilities in the vicinity of the Project Site. The Project would also provide streetscape improvements, including new trees to provide adequate shade and a more comfortable environment for pedestrians as well as floor to ceiling windows and transparent materials at the ground floor. Therefore, the Project would not conflict with this policy. |
| **Policy 6.4.8:** Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.<br><br>b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities. | **No Conflict.** Refer to Policy 6.4.7 above. |
| **Economic Development Chapter** | |
| **Objective 7.2**: Establish a balance of land uses that provides for commercial and industrial | **No Conflict**. The Project would support this objective by providing 16,120 square feet of ground-floor commercial |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. | space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail) to complement the employment base of the area, help meet needs of local residents, and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, VMT, and air pollution to ensure maximum feasible environmental quality. Therefore, the Project would not conflict with this objective. |
| **Policy 7.2.3**: Encourage new commercial development in proximity to rail and bus transit corridors and stations. | **No Conflict**. The Project would develop 16,120 square feet of ground-floor commercial space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail) in an area well served by public transit. Specifically, Metro Local Bus Routes 102 and 115, LADOT Commuter Express CE Route 574, Santa Monica BBB Routes 3 and Rapid 3, and Culver CityBus Routes 6 and Rapid 6. Therefore, the Project would not conflict with this policy. |
| **Policy 7.2.5**: Promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population when planning new residential neighborhoods or major residential developments. | **No Conflict**. As discussed under Objective 7.2 and Policy 7.2.3 above, the Project would include approximately 16,120 square feet of ground-floor commercial space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail) that would serve employees, visitors, and the local neighborhood, which would reduce VMT. Therefore, the Project would not conflict with this policy. |
| **Infrastructure and Public Services Chapter** | |
| **Policy 9.3.1**: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system. | **No Conflict**. As discussed under Item X, Hydrology and Water Quality, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a SWPPP adhering to the California Stormwater Quality Association BMP Handbook. The Project would implement BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. In addition, during operation, the Project would include the installation of pre-treatment system and infiltration BMPs to collect and store the first flush of stormwater runoff to satisfy LID Manual requirements, which would then be discharged to an approved discharge point in the public right-of-way. The Project does not include uses that handle or generate hazardous substances. Thus, with the implementation of the BMPs, the Project would reduce the amount of hazardous substances and the total amount of flow entering the wastewater system over existing conditions and the Project would not conflict with this policy. |
| **Goal 9B:** A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.<br><br>**Objective 9.6:** Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality. | **No Conflict.** While this is a citywide goal, the Project would not interfere with its implementation as detailed in Policy 9.3.1 above. Therefore, the Project would not conflict with this goal and objective. |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| **Objective 9.10:** Ensure that water supply, storage, and delivery systems are adequate to support planned development. | **No Conflict.** As evaluated under Item XIX, Utilities and Service Systems, based on the WSA prepared for the Project, LADWP would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. . Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the Project would not conflict with this objective and no new water supply, storage, and delivery systems are required to support the development. |
| ***Goal 9D:*** An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal. | **No Conflict.** While this is a citywide objective, the Project would support its implementation by promoting sustainable development, including the provision of recycling facilities and other waste reduction features. |
| **Housing Element** | |
| **Goal 1**: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs. | **No Conflict**. The Project would construct 489 residential units of various sizes and would also set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of a mix of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations and at different price points, thereby providing a range of housing opportunities. Therefore, the Project would not conflict with goal. |
| **Policy 1.1.4:** Plan for and provide sufficient services and amenities to support the existing and planned population. | **No Conflict.** While this is a citywide goal, with regard to utilities and service systems, as discussed under Item XIX, Utilities and Service Systems, below, the existing infrastructure would have sufficient capacity to accommodate the Project. In addition, the Project would provide a variety of open space and recreational amenities to enhance the open space resources in the neighborhood. |
| **Policy 1.2.1:** Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs.<br><br>**Policy 1.2.2:** Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households. | **No Conflict.** Refer to the response for Goal 1, above. |
| **Goal 2:** A City that preserves and enhances the quality of housing and provides greater housing stability for household of all income levels. | **No Conflict**. Refer to the response for Goal 1, above. |
| **Goal 3:** A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos. | **No Conflict.** The Project would construct 489 residential and live-work units (inclusive of 64 Very Low-Income Households) within a site that is well-served by public transit. The Project would include an array of amenities for the residents that would contribute to a healthy and livable community, including a 2,345-square-foot plaza on the southern end of the Project Site to complement the |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and extensive landscaping. In addition, the design of the Project is based on principles of environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly design, and proximity to public transit. In addition, 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 CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. Thus, the Project would create a healthy, livable, sustainable, and resilient community. Therefore, the Project would not conflict with this goal. |
| **Policy 3.1.5:** Develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements in development of a project and within the public and private realm such as shade trees, parkways, and comfortable sidewalks.<br><br>**Policy 3.1.7:** Promote complete neighborhoods by planning for housing that includes open space, and other amenities. | **No Conflict.** The Project would support this policy by implementing sustainability measures consistent with the Los Angeles Green Building Code and CALGreen that would reduce energy and water usage and waste, thereby reducing associated GHG emissions and minimizing the Project's impact on natural resources and infrastructure. These measures would include, but not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and water-efficient landscape design. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable. The Project would also incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. Therefore, the Project would not conflict with these policies. |
| **Objective 3.2:** Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.<br><br>**Policy 3.2.1:** Promote the integration of housing with other compatible land uses at both the building and neighborhood level.<br><br>**Policy 3.2.5:** Promote and facilitate the reduction of water, energy, carbon and waste consumption in new and existing housing. | **No Conflict.** The Project would incorporate environmentally sustainable design features and open space areas and amenities as described in response to Policy 3.1.5 and Policy 3.1.7, above. The Project would create a mixed-use development consisting of residential and commercial (retail/restaurant) uses. The Project would be located in an area well-served by public transit. In addition, the Project would provide bicycle parking throughout the Project Site to encourage alternative modes of transportation. The Project's residential development would consist of a mix of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units. Furthermore, the proposed residential and commercial uses would be integrated with a variety of open space and landscaping opportunities. Therefore, the Project would not conflict with this objective and these policies. |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| **Mobility Plan 2035** | |
| **Policy 1.6**: Design detour facilities to provide safe passage for all modes of travel during times of construction. | **No Conflict**. During construction of the Project, the majority of construction activities would be anticipated to be confined on-site. However, limited construction activities may be needed on adjacent rights-of-way. Pursuant to Project Design Feature TR-PDF-1, the Project would prepare and implement a Construction Management Plan to minimize potential construction impacts to the surrounding area related to construction trucks, worker trips, and any possible sidewalk and lane closures and ensure safe passage for all modes of travel during Project construction. Therefore, the Project would not conflict with this policy. |
| **Policy 2.3**: Recognize walking as a component of every trip and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment. | **No Conflict**. The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, and sidewalks that meet their designated width. The access point on La Tijera Boulevard would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. Each driveway would all be designed to provide safe access for pedestrians. As previously discussed, the Project would introduce ground-level commercial uses with entrances along the Project frontages. These street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. The Project would also include new street trees along the perimeter of the Project Site, further enhancing the pedestrian environment. Furthermore, the Project would also include pedestrian-scale lighting fixtures and elements. Therefore, the Project would not conflict with this policy. |
| **Policy 2.10:** Facilitate the provision of adequate on and off-street loading areas. | **No Conflict.** Passenger loading would be accommodated on-site with access provided via driveways along Truxton Avenue and La Tijera Boulevard. Therefore, the Project would not conflict with this policy. |
| **Policy 3.1**: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City's transportation system. | **No Conflict**. While this is a citywide policy, the Project would promote this policy by providing adequate vehicular and pedestrian access and providing bicycle parking, as previously discussed. In addition, the Project would be located in an area well served by public transit. Therefore, the Project would not conflict with this policy. |
| **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 support this policy by locating new development consisting of residential and commercial uses in proximity to employment, destinations, and other neighborhood services in a transit-rich area, and in a designated Job Center, TPA, HQTA, NMA, and near a Livable Corridor. Therefore, the Project would not conflict with this policy. |
| **Policy 3.4**: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services. | **No Conflict**. The Project would support the implementation of this citywide policy by locating a new mixed-use development in an area well served by public transit. Residents, employees, and visitors to the Project Site would |

**Table 19 (Continued)**
**Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | be well-served by local and regional transit options, which would reduce the number of vehicle miles traveled. Therefore, the Project would not conflict with this policy. |
| **Policy 3.8**: Provide bicyclists with convenient, secure and well maintained bicycle parking facilities. | **No Conflict**. The Project would provide a total of 234 residential and commercial bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces). The Project would also provide a closed-circuit security camera system to ensure that the bicycle parking and storage areas are secured and well-maintained. Therefore, the Project would not conflict with this policy. |
| **Policy 5.2**: Support ways to reduce vehicle miles traveled (VMT) per capita. | **No Conflict**. The Project supports implementation of this policy by locating a mix of residential, retail, and restaurant uses in an area well served by public transit. The Project would also promote pedestrian activity through building design and streetscape amenities that would provide better connections to transit stops. The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. In addition, as outlined under Item XVII, Transportation, the Project would incorporate several TDM measures to reduce the number of single occupancy vehicle trips to the Project Site. Therefore, the Project would support ways to reduce VMT and would not conflict with this policy. |
| *Source: Eyestone Environmental, 2024.* | |

### Land Use Chapter

The Framework Element Land Use Chapter identifies districts, centers, and mixed-use boulevards, which are described in terms of ranges of intensity/density, heights, and lists of typical uses. The Project Site is located in an area that is identified as a Community Center on the Framework Element's Long Range Land Use Diagram for the City's West/Coastal Los Angeles area. As provided in the Land Use Diagram, a Community Center is characterized as a focal point for surrounding residential neighborhoods and containing a diversity of uses such as small offices and overnight accommodations, cultural and entertainment facilities, schools and libraries, in addition to neighborhood-oriented services. Community Centers will fall within an FAR of 1.5:1 to 3.0:1. Generally, the height of different types of Community Centers will also range from two- to six-story buildings depending on the character of the surrounding area. Community Centers are served by small shuttles, local buses in addition to automobiles and/or may be located along rail transit stops. The Project would generally be consistent with the type of use and at the intensity envisioned for a Community Center. As described in Section 3, Project Description, of this SCEA, the Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within a single 8-story building with a maximum height of 96 feet. Upon completion, the Project would result in a total floor area of approximately 416,915 square feet with a FAR of 4:1. As discussed in subsection 3.4, Requested Permits and Approvals, of the Project Description, the Applicant requests

an Off-Menu Incentive, for an increase in the FAR to 4:1 in lieu of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone as well as a Waiver of Development Standard, for relief from Transitional Height requirements pursuant to LAMC Section 12.21.1 A.10 to permit 96 feet within 100-199 feet of an R1 zone instead of a maximum 61 feet. With the approval of this request, the Project would not conflict with the Land Use Chapter.

Additionally, as detailed Table 19 on page 256, the Project would support and would be consistent with the Land Use Chapter as it would contribute to the City's goal for a physically balanced distribution of land uses that facilitates conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, and assurance of environmental justice and a healthful living environment. In particular, the Project would promote a more balanced distribution of land uses with the replacement of the existing underutilized commercial buildings with a new mixed-use building that would include residential uses and ground-floor retail and restaurant space that could be filled by a variety of tenants. These proposed uses would be developed in an area well served by public transit provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 102 and 115 along Manchester Avenue with connections from the 102 to the Metro E Line (Expo Line) at Expo/Western, Expo/Vermont, and Expo Park/USC; LADOT CE Route 574; Culver City Line 6 Bus; Culver City Rapid 6 Bus; and Santa Monica BBB Route 3 and Rapid 3 along Sepulveda Boulevard. Furthermore, the Project would provide secure bicycle parking and EV charging infrastructure on-site. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while supporting the City's objective to encourage multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards and in designated Community Centers. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

**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 Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the community plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The Project's consistency with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element is discussed under Item I, Aesthetics, of this SCEA. As concluded therein, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

### 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. This chapter also includes policies to resolve the City's open space issues. Specifically, this chapter contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

The Project's consistency with this Framework Element chapter is provided in Table 19 on page 256. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. In particular, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Furthermore, the Project would not conflict with or encroach upon the public and private open space system. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

### Infrastructure and Public Service 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 and two traffic signals at the project driveways. 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 the Framework Element's Infrastructure and Public Services Chapter is discussed in Table 19. As described therein, the Project would comply with the City's grading permit

regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As discussed under Item XIX, Utilities and Service Systems, of this SCEA, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

### Conservation Element

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources. The Conservation Element also recognizes the City's responsibility for identifying and protecting its cultural and historical heritage.

As previously described, the Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking and does not contain any natural resources. As discussed throughout this SCEA, the Project would have no significant impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed under Item IV, Biological Resources, above, the trees and landscaping within the Project Site are not subject to the City's Protected Tree and Shrub Ordinance. With respect to historic resources, as discussed under Item V, Cultural Resources, of this SCEA, the existing on-site buildings are not considered to be historic resources as defined by CEQA. Furthermore, none of the potential historical resources in the vicinity of the Project Site would be directly or indirectly affected by the Project as they are physically separated from the Project Site and the primary public views and general character of these resources would remain unchanged by the Project. The Project would also implement the City's standard conditions of approval to ensure that potential impacts to archaeological, paleontological, and tribal cultural resources would remain less than significant. Furthermore, as analyzed under Item I, Aesthetics, of this SCEA, the Project would not obstruct or remove access to natural and scenic vistas. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Overall, as outlined above, the Project would not conflict with the Conservation Element.

### Housing Element

The 2021–2029 Housing Element (Housing Element), which was adopted on November 24, 2021, and subsequently amended by the City Council on June 14, 2022, identifies the City's housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;

- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households at all income levels;

- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;

- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and

- Goal 5: A City that is committed to preventing and ending homelessness.

The Project's consistency with the applicable goals, policies, and objectives set forth in the Housing Element is analyzed in Table 19 on page 256. As described therein, the Project would construct 489 residential units of various sizes and would set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations and at different price points, thereby directly providing a diverse range of new housing opportunities for the City's residents. The Project would provide these new housing opportunities for residents in a diverse residential and commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro, LADOT CE, Santa Monica BBB, and Culver CityBus. Additionally, the Project would further contribute to an active pedestrian environment through its landscaping and other streetscape improvements. Also, 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 CALGreen. These standards would reduce energy, water usage, and waste generation, thereby reducing associated GHG emissions and minimizing the impact on natural resources and infrastructure. Therefore, as detailed in Table 19, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

**Transportation Element/Mobility Plan 2035**

The Mobility Plan, adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan.

The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. The Mobility Plan 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." The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:[135]

- Safety First;

[135] *Los Angeles Department of City Planning, Mobility Plan 2035, September 2016.*

- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in Table 19 on page 256. Specifically, the Project would support the Mobility Plan policy to provide for safe passage of all modes of travel during construction by implementing a Construction Management Plan pursuant to Project Design Feature TR-PDF-1, which 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, transit stops, and pedestrians; and reduce congestion to public streets. The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, and sidewalks that meet their designated width. The access point on La Tijera Boulevard would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. Each driveway would be designed to provide safe access for pedestrians. Also, the Project's proximity to a variety of public transit options would provide residents, workers, and visitors convenient access to transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

**Westchester–Playa del Rey Community Plan**

The Westchester–Playa del Rey Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Adopted in 2004, the Community Plan is currently in the process of an update. The Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community.

The Project would preserve and enhance the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities and improve the function, design and economic vitality of the commercial corridors. The Project will also advance a number of other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in Table 20 on page 272. As set forth therein, the Project would be consistent with the applicable objectives and policies set forth in the Community Plan.

### Los Angeles Coastal Transportation Corridor Specific Plan

Pursuant to Government Code Section 65450 et seq., a specific plan is a land use mechanism for systematically implementing the general plan for a prescribed geographic area. The Los Angeles Coastal Transportation Corridor Specific Plan was first adopted by the City in 1993, and last updated in 2018. The intent of the Los Angeles Coastal Transportation Corridor Specific Plan is to:

- Provide a mechanism to fund specific transportation improvements generated by new development within the Specific Plan area;
- Establish the Coastal Transportation Corridor Impact Assessment Fee process;
- Regulate the phased development of land uses, insofar as the transportation infrastructure can accommodate such uses; establish a Coastal Transportation Corridor infrastructure implementation process;
- Promote or increase work-related ridesharing and bicycling; avoid peak-hour level of service on streets and intersections from reaching level of service F;
- Promote the development of coordinated and comprehensive transportation plans; and
- Reduce commute trips; ensure that public transportation facilities will benefit the contributor; and encourage Caltrans to widen the San Diego Freeway for high-occupancy vehicle lanes.

The Specific Plan assesses a one-time Transportation Impact Assessment (TIA) fee on qualifying new development and identifies a comprehensive set of transportation improvements that are funded in part by the fee revenue. Per the Specific Plan, affordable dwelling units and 100 percent affordable projects are exempt from the residential TIA fee. Based on the proposed uses, the Project Applicant will pay the required TIA fee for the Project in accordance with the requirements of the Specific Plan. The Project would also comply with the improvement, dedication, transportation measures, TDM and phasing requirements outlined in Sections 9 and 10 of the Specific Plan.

**Table 20**
**Consistency with Goals, Objectives, and Policies of the Community Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| **Land Use Policies and Programs—Residential** | |
| **Goal 1**: Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community. | **No Conflict**. The Project's 489 dwelling units, including 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density), would provide new housing opportunities to people in need of housing, help to meet the diverse housing needs within the Community Plan area, and make new housing opportunities available to the Community Plan's population. Furthermore, the development of the commercial uses on the Project Site, combined with the residential uses, would constitute an appropriate location of new housing as well as community-serving uses in close proximity to existing transit infrastructure and existing nearby low to midrise commercial developments, while protecting nearby single-family residential neighborhoods. Thus, the Project would not conflict with this goal. |
| **Objective 1-1**: Provide for the preservation of existing 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 Community Plan Area to the year 2025. | **No Conflict**. No housing units would be removed as part of the Project. The Project would provide 489 residential and live-work units, including 64 Very Low-Income Households (i.e., 13 percent of the total dwelling units) to accommodate the need for housing units within the Community Plan area and across the City. Thus, the Project would not conflict with this objective. |
| **Objective 1-2:** Locate housing near commercial centers, public facilities, and bus routes and other transit services, to reduce vehicular trips and congestion and increase access to services and facilities. | **No Conflict.** The Project would construct 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space in an area well served by public transit provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 102 and 115 along Manchester Avenue with connections from the 102 to the Metro E Line (Expo Line) at Expo/Western, Expo/Vermont, and Expo Park/USC; LADOT CE Route 574; Culver City Line 6 Bus; Culver City Rapid 6 Bus; and Santa Monica BBB Route 3 and Rapid 3 along Sepulveda Boulevard. Additionally, the Project will further contribute to an active pedestrian environment through its landscaping, street tree planting, and other streetscape improvements, which will make the Project accessible to residents. Thus, the Project would not conflict with this objective. |
| **Policy 1-2.1**: Locate higher residential densities near commercial centers, public facilities, bus routes and other transit services. | **No Conflict**. The Project would construct a high-density residential/commercial development on a site already served by public infrastructure and services and in proximity to job centers and retail uses. The Project Site is also served by a variety of transit options provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 102 and 115 along Manchester Avenue with connections from the 102 to the Metro E Line (Expo Line) at Expo/Western, Expo/Vermont, and Expo Park/USC; LADOT CE Route 574; Culver City Line 6 Bus; Culver City Rapid 6 Bus; and Santa Monica BBB Route 3 and Rapid 3 along Sepulveda Boulevard. Therefore, the Project would not conflict with this policy. |

**Table 20 (Continued)**
**Consistency with Goals, Objectives, and Policies of the Community Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | |
| **Objective 1-4**: Provide affordable housing and increased accessibility to more population segments, especially students, the disabled and senior citizens. | **No Conflict**. The Project would develop new affordable housing units in order to directly meet the high demand for additional housing in the City and Community Plan area. Specifically, the Project would provide 64 Very Low-Income Households, which represents 24 percent of the Project's base density. Thus, the Project would not conflict with this objective. |
| **Policy 1-4.2**: Promote the development of housing for persons of low to moderate income within the community. | **No Conflict**. The Project would construct 489 residential units of various sizes and would also set aside 64 units for Very Low-Income Households (i.e., 24 percent of the Project's base density). These units would consist of a mix of 229 studios, 172 one-bedroom units (including 6 one-bedroom live-work units), and 88 two-bedroom units in varying sizes and configurations and at different price points, thereby providing a range of housing opportunities. Therefore, the Project would not conflict with policy. |
| **Policy 1-4.3**: Ensure that new housing opportunities minimize displacement of residents. | **No Conflict.** The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As no housing currently exists on the Project Site, the Project would not cause the displacement of any residents. Thus, the Project would not conflict with this policy. |
| **Objective 1-6**: Preserve visual resources in residential areas. | **No Conflict.** As analyzed under Item I, Aesthetics, of this SCEA, the Project is located in an urban area with relatively flat terrain and built out surroundings; therefore, publicly available scenic vistas of any valued visual resources in the vicinity of the Project Site are not generally available. Thus, the Project would not conflict with this objective. |
| **Land Use Policies and Programs—Commercial** | |
| **Policy 2-1.1**: New commercial uses should be located in existing established commercial areas or shopping centers. | **No Conflict**. The Project Site is located in an urbanized area developed with a mix of low to mid-rise commercial and residential uses. The Project would provide approximately 16,120 square feet of ground-floor commercial space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail). Thus, the Project would not conflict with this policy. |
| **Objective 2-2**: Strengthen and enhance the major commercial districts of the community into distinctive, pedestrian-friendly areas providing shopping, civic, social, and recreational activities.<br><br>**Policy 2-2.2:** In appropriate areas, encourage the incorporation of retail, restaurant, and other commercial uses in the ground floor street frontage of structures to promote a more lively and pedestrian oriented commercial environment<br><br>**Policy 2-2.3:** Encourage mixed-use development in appropriate commercial areas | **No Conflict.** The Project Site is located in an urbanized area developed with a mix of low to mid-rise commercial and residential uses. The Project would provide 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. Of the 16,120 square feet of commercial space, approximately 10,747 square feet would be restaurant uses and 5,373 square feet would be retail. Overall, the proposed uses would help meet the needs of local residents. Street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a more pedestrian-friendly environment. The Project would also enhance the pedestrian environment through its design via the |

**Table 20 (Continued)**
**Consistency with Goals, Objectives, and Policies of the Community Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| to stimulate pedestrian activity and provide housing near employment, shopping, and other services. | inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site; as well as the provision of a pedestrian plaza. Thus, the Project would not conflict with this objective and policies. |
| **Objective 2-3:** Enhance the land use compatibility, visual appearance, design and appeal of commercial development. | **No Conflict.** The Project is a new mixed-use residential development with commercial uses that would serve the existing and future residents of the surrounding community. The proposed uses would be consistent and compatible with the existing adjacent low and mid-rise uses surrounding the Project Site. Furthermore, the Project would create a street-level identity for the Project Site and improve the pedestrian experience as previously described above as well as through the introduction of commercial uses on the ground level. Thus, the Project would not conflict with this objective. |
| **Policy 2-3.4:** Minimize conflicts between auto-related and pedestrian-oriented activities in commercial areas. | **No Conflict.** The Project would reduce the overall number of vehicular driveways and potential conflicts by providing one full-access driveway on Truxton Avenue and one full-access driveway on La Tijera Boulevard. The two existing driveways on Manchester Avenue would be removed and the two existing driveways on La Tijera Boulevard would be consolidated into one driveway. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. Overall, the Project is designed to encourage and accommodate the increases in pedestrian and bicycle activity to and from the Project Site, though not in sufficient quantities to result in a significant conflict with the vehicles using the access points. Thus, the Project would not conflict with this policy. |
| **Land Use Policies and Programs—Open Space** | |
| **Goal 5**: Provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the community, and to protect environment and aesthetic resources.<br><br>**Objective 5-1:** Preserve existing open space resources and where possible develop new open space. | **No Conflict.** The Project would provide approximately 51,385 square feet of open space, which would exceed the LAMC-required open space. In particular, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4. Overall, the Project's |

**Table 20 (Continued)**
**Consistency with Goals, Objectives, and Policies of the Community Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | proposed open space would exceed the requirements of the LAMC. Thus, the Project would not conflict with this goal and objective. |
| **Police Protection** | |
| **GOAL 8:** Continue to provide the community with adequate police facilities and service to protect its residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services.<br><br>**Objective 8-1:** Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands. | **No Conflict**. Consistent with Goal 8 and applicable objectives and policies. In order to ensure that the Project would provide adequate security, and would not impede police protective services, the Project would be reviewed by the City to ensure design guidelines relative to security, semi-public and private spaces, are implemented. Therefore, the Project would not conflict with this goal and objective. |
| **Policy 8-2.2:** Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security. | **No Conflict**. As discussed under Item XV, Public Services, of this SCEA, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building and the Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment. Thus, the Project would not conflict with this policy. |
| **Fire Protection** | |
| **GOAL 9:** Protect the residents of the community through a comprehensive fire and life safety program.<br><br>**Objective 9-1:** Maintain fire facilities and protective services that are sufficient for the existing and future population and land use.<br><br>**Policy 9-1.1:** Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands. | **No Conflict**. Consistent with Goal 9 and applicable objectives and policies, the Project would be located in proximity to an existing fire station (refer to Item XV, Public Services). Plans would be subject to the approval of the Los Angeles Fire Department (LAFD) for fire and life safety plan review. LAFD would review fire truck access, fire department connection location, and hydrant pressure requirements for the Project. Therefore, the Project would not conflict with this goal, objective, and policy. |
| **Transportation** | |
| **Objective 13-1**: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary Freeway and Street access and improvements are provided to accommodate additional traffic anticipated from Community Plan land use changes and/or by new development. | **No Conflict**. As concluded in the Transportation Assessment included as Appendix K.1 of this SCEA, the Project would not result in any VMT impacts under the City's current criteria. Furthermore, the Project would promote multi-modal transportation through its location in a HQTA with access to several transit options. In addition, the Project would encourage biking and walking by providing a total of 234 bicycle parking spaces. The Project would provide five-foot dedications along the Project frontage on La Tijera Boulevard and Manchester Avenue to meet the street dedication widths required by the Mobility Plan. The new consolidated driveway would be designed in accordance with the standards set forth in *Manual of Policies and Procedures* and subject to the |

**Table 20 (Continued)**
**Consistency with Goals, Objectives, and Policies of the Community Plan**

| Goal/Objective/Policy | Analysis of Project Consistency |
|---|---|
| | approval of LADOT and Bureau of Engineering. Thus, the Project would not conflict with this objective. |
| **GOAL 15:** Encourage alternative modes of transportation to reduce single-occupancy vehicular trips. | **No Conflict**. As previously discussed, the Project Site is served by a variety of public transit options provided by Metro, LADOT CE, Culver CityBus, and Santa Monica BBB. Furthermore, the Project design would reduce the number of single occupancy vehicle trips to the Project Site by including a reduced vehicle parking supply and providing bicycle parking per LAMC requirements. Thus, the Project would not conflict with this goal. |
| **GOAL 16:** Encourage a system of safe, efficient and attractive bicycle and pedestrian facilities.<br><br>**Objective 16-2**: To promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers. | **No Conflict**. As previously discussed, the Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, and sidewalks that meet their designated width. The access point on La Tijera Boulevard would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. Driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would also would incorporate pedestrian alert safety signs at driveways and walking paths within the parking garage as well as mirrors in areas of pedestrian/automobile interface, if needed, to improve visibility. The driveways would be designed to maximize sight distance and visibility to minimize potential vehicle-bicycle and vehicle-pedestrian conflicts. The Project would also provide secure long-term and short-term bicycle parking spaces in accordance with LAMC requirements. Furthermore, the Project does not include any design features that could pose safety issues to travelers. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Thus, the Project would not conflict with this goal and objective. |
| **Historic and Cultural Resources** | |
| **GOAL 16**: Preservation and restoration of cultural resources, neighborhoods and landmarks which have historical and/or cultural significance.<br><br>**Objective 16-1**: To ensure that the community's historically significant resources are protected, preserved, and/or enhanced. | **No Conflict**. As discussed under Item V, Cultural Resources, the Project would not directly impact any historical or cultural resources as there are none on the Project Site. In addition, the potential historical resources in the vicinity of the Project Site would not be directly or indirectly impacted by the Project. Thus, the Project would not conflict with this goal and objective. |

*Source: Eyestone Environmental, 2024.*

### Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The LAMC establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a brief discussion of the Project's consistency with the LAMC requirements for the Project Site is provided below for informational purposes.

The Project Site is zoned [Q]C2-1-CDO (Commercial, Height District 1, Community Design Overlay). Pursuant to the LAMC, the C2 Zone permits limited commercial uses, including C1 (limited commercial) uses, retail, theaters, hotels, broadcasting studios, parking buildings, parks and playgrounds, and R4 (residential multiple dwelling) uses. As discussed in Section 3, Project Description, of this SCEA the Project Site's Q condition was established in 2008, and requires compliance with the Downtown Westchester Community Design Overlay District, as discussed below. The "1" indicates that the Project Site is located in Height District 1, which in conjunction with the C2 Zone, does not impose a maximum building height but does limit the FAR to 1.5:1. The "CDO" indicates the Project Site is located within the Downtown Westchester Community Design Overlay (CDO) District, which provides design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, appearance and enjoyment of Downtown Westchester.

The Applicant requests the following discretionary entitlements, reviews, permits and approvals:

- Pursuant to pursuant to LAMC Section 12.22 A.25(g)(3), a Density Bonus Application for a Project having 489 residential dwelling units,[136] including 64 units reserved for Very Low-Income Households, with the following Off-Menu Incentives:
  - Off-Menu Incentive, for an increase in the Floor Area Ratio (FAR) to 4.0:1 in lieu of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone;
  - Off-Menu Incentive, for a decrease in the required side yard to 5 feet in lieu of the otherwise required 11 feet in the C2-1 Zone along Truxton Avenue;
  - Off-Menu Incentive, for relief from the Downtown Westchester CDO standard 5a, to include residential units on the ground floor in the form of live/work units;
  - Waiver of Development Standard, for relief from Transitional Height requirements pursuant to LAMC Section 12.21.1 A.10 to permit 96 feet within 100-199 feet of an R1 zone instead of a maximum 61 feet; and
  - Waiver of Development Standard, for relief from the Downtown Westchester CDO Standard 5c, to provide a 0-foot setback from the ground floor frontage for the residential floors facing Manchester Avenue in lieu of the otherwise required 5-foot setback.

[136] *The Project is requesting a total density increase of 85 percent pursuant to AB 1287 by providing 15 percent of by-right units for Very Low Income households and an additional 9 percent of by-right units for Very Low Income households, for a total of 24 percent of by-right units reserved for Very Low Income households, or 64 Very Low Income units*

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit to allow the sale and dispensing of a full-line of alcoholic beverages for on-site consumption within up to 16,120 square feet of commercial space; and

- Pursuant to LAMC Section 16.05, Site Plan Review for a development project that results in an increase of 50 or more dwelling units and/or guest rooms; and

- Pursuant to Ordinance No. 185,573, Reduction of Required On-Site Trees and payment of an in-lieu fee equivalent to 44 trees, to allow 79 on-site trees in lieu of 123.

As discussed in Section 3, Project Description, of this SCEA, the Project includes the construction of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within a single 8-story building with a maximum height of 96 feet. As part of the Project, the existing commercial structures totaling 21,911 square feet would be removed. Upon completion, the Project would result in a total floor area of approximately 416,915 square feet with a FAR of 4:1. The proposed residential and commercial uses would be consistent with the types of uses permitted by the current zoning and with the types of uses surrounding the Project Site. With the approval of the above requests, the Project would not conflict with the LAMC.

**Downtown Westchester Community Design Overlay District**

The Project's consistency with the relevant objectives and policies that support the goals of the Downtown Westchester CDO District is discussed under Item I, Aesthetics, of this SCEA. As concluded therein, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Downtown Westchester CDO District.

***Overall, based on the above, the Project would not conflict with the 2020–2045 and 2024–2050 RTP/SCS, LAMC, Westchester–Playa del Rey Community Plan, Los Angeles Coastal Transportation Corridor Specific Plan, Downtown Westchester CDO District, or the City of Los Angeles General Plan. Therefore, the Project would not 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, and impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The cumulative analysis takes into consideration the seven related projects within 1 mile of the Project Site (listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA). The related projects primarily consist of infill development. As such, similar to the Project, the proposed construction associated with the related projects would be confined to the related project sites and would not physically divide a community. The uses proposed by the related projects, including mixed-use, commercial, hotel, industrial, and school facilities, would also be compatible with the various uses throughout the Project Site.

In addition, as with the Project, the related Projects would be required to comply with relevant land use plans, policies, and regulations. Because the approval of the Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Furthermore,

the related projects would also have to demonstrate that they do not conflict with applicable land use plans.

***As such, based on the above, cumulative impacts related to the physical division of an established community and cumulative impacts related to conflicts with land use plans, policies, or regulations 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 MRZ-2 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 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM MIN-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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 MRZ-2 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 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

**a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** No mineral extraction operations currently occur on the Project Site, and none are proposed by the Project. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[137,138,139] The Project Site is also not located within a City-designated oil field or oil drilling area.[140] ***Therefore, the Project would not result in the loss of availability of a known mineral resource, and no impact would occur.***

**b. Would the project 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.** No mineral extraction operations currently occur on the Project Site. Furthermore, 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 Geological Survey. The Project Site is also not located within a City designated oil field or oil drilling area. ***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**

**Less Than Significant Impact.** Like the Project, the seven (7) related projects are located within a developed, urbanized area of the City and do not support existing or future mineral extraction. It is unknown whether or not any of the related project sites contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral resources, it would not contribute to a potential cumulative impact. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.***

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[137] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.*

[138] *State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.*

[139] *City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.*

[140] *California Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#/-118.23029/34.06052/16, accessed May 15, 2024.*

# 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 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) Install temporary noise barriers during construction.

b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.

d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

f) Designate an on-site construction complaint and enforcement manager for the project.

g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise

suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.

j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.

k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where 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***

As described below, the Project does not have the potential to result in significant noise impacts related to off-site construction of the Project or on- or off-site Project operation. However, there is the potential for significant noise impacts associated with the Project's on-site construction activities. Based on a 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-1, to address potentially significant on-site construction noise impacts. As this measure addresses specific Project and Project Site conditions, it would be consistent with but more effective and tailored to the Project than Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR in mitigating these potentially significant impacts. In addition, while other measures included in Mitigation Measure PMM-NOI-1 from the 2020–2045 RTP/SCS PEIR would generally be applicable to the Project, 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 equal to or more effective that the measures outlined in Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

**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, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.

b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.

c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

***Applicability to the Project***

As analyzed below, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Thus, while some of the measures outlined in Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, existing regulatory requirements would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-2 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

**SCAG 2024–2050 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 CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce ambient noise levels in the vicinity of the project, 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 between noise sources and noise-sensitive land uses and species.

b) Include permanent noise barriers and sound-attenuating features as part of the project design between noise sources and noise-sensitive land uses and species. Barriers could be in the form of outdoor barriers, sound walls,

buildings, landscaped berms, dense planting, or earth berms to attenuate noise at adjacent sensitive uses. Sound-attenuating features could be in the form of grade separation, buffer zones, reduced-noise paving materials, and traffic calming measures.

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 re-pavement is planned.

l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

m) 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.

n) 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.

o) Stationary noise sources can and should be located as far from adjacent sensitive receptors and species to the maximum extent feasible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

p) Use of portable barriers in the vicinity of sensitive receptors during construction.

q) 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.

r) Monitor the effectiveness of noise attenuation measures by taking noise measurements.

s) 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.

***Applicability to the Project***

As described below, the Project does not have the potential to result in significant noise impacts related to off-site construction of the Project or on- or off-site Project operation. However, there is the potential for significant noise impacts associated with the Project's on-site construction activities. Based on a 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 Mitigation Measure NOI-MM-1, below, to address potentially significant on-site construction noise impacts. As this measure addresses specific Project and Project Site conditions, it would be consistent with but more effective than Mitigation Measure PMM NOI-1 from the 2024–2050 RTP/SCS PEIR in mitigating these potentially significant impacts as it would be tailored to the Project. In addition, while other measures included in Mitigation Measure PMM-NOI-1 from the 2024–2050 RTP/SCS PEIR would generally be applicable to the Project, 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 equal to or more effective that the measures outlined in Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

**PMM NOI-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to groundborne

vibration. 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 and reduce the vibration occurrences and magnitude.

d) Perform construction activities within 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).

***Applicability to the Project***

As analyzed below, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Thus, while some of the measures outlined in Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS PEIR would generally apply to the Project, including the restriction of construction hours and the maintenance of construction equipment, existing regulatory requirements would be equal to or more effective than the measures outlined in Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS PEIR. Thus, Mitigation Measure PMM NOI-2 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

**Impact Analysis**

**a. Would the project result in 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.**

**Existing Noise Environment**

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. The City's Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship;

hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks. Four off-site noise receptor locations in proximity to the Project were selected, representing the nearest noise sensitive (residential and house of worship) uses surrounding the Project Site. The descriptions of the four off-site noise receptors are provided in Table 21 on page 290.

Ambient noise measurements were taken at the four selected off-site noise sensitive receptors on September 20, 2022, using a Larson-Davis Model 870 Integrating/Logging and a Question Model 2900 Sound Level Meters.141 A 24-hour measurement was conducted at receptor location (R1). Two 15-minute measurements were conducted at three off-site receptor locations (R2, R3 and R4), one during the daytime hours (between 10:00 A.M. and 12:00 P.M.) and one during the nighttime hours (between 10:00 P.M. and 12:00 A.M.). The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes.

The results of the ambient sound measurement data are summarized in Table 21. As indicated in Table 21, the existing daytime ambient noise levels surrounding the Project Site ranged from 55.6 dBA ($L_{eq}$) at receptor R4 to 73.0 dBA ($L_{eq}$) at receptor R1. The nighttime ambient noise levels ranged from 52.5 dBA ($L_{eq}$) at receptor R4 to 69.5 dBA ($L_{eq}$) at receptor R1. Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Manchester Avenue and La Tijera Boulevard). Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

### Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the nearest off-site sensitive receptor locations and comparing these estimated construction-related noise levels to the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Overall, Project construction is anticipated to span 30 months (from August 2026 through January 2029). Project construction activities would comply with LAMC Section 41.40, which limits construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

### On-Site Construction

Typical construction equipment would produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, based on the data provided in the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006).[142] These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the

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[141] *The Larson-Davis Model 870 and Quest Model 2900 sound meter meets and exceeds the minimum industry standard performance requirements for "Type 1" and "Type 2" standard instruments, respectively, as defined in the American National Standard Institute (ANSI) S1.4. It also meets the requirement specified in Section 111.01(l) of the LAMC that instruments be "Type S2A" standard instruments or better. The sound meter was calibrated and operated according to the manufacturer's written specifications.*

[142] *Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006.*

**Table 21**
**Existing Ambient Noise Levels**

| Receptor Location | Approximate Distance to Project Site[a] (feet) | Measured Noise Levels, dBA $L_{eq}$ | | CNEL (dBA) |
|---|---|---|---|---|
| | | Daytime Hours[b] (7:00 A.M.– 10:00 P.M.) | Nighttime Hours[b] (10:00 P.M.– 7:00 A.M.) | |
| R1—Single-family residential use on the south side of La Tijera Boulevard, south of the Project Site | 100 | 73.0 | 69.5 | 77.1 |
| R2—Single-family residential use on the north side of Manchester Avenue, north of the Project Site | 100 | 67.8 | 64.7 | 70.2[c] |
| R3—House of worship at the northeast corner of La Tijera Boulevard and Manchester Avenue, northeast of the Project Site | 490 | 71.3 | 66.7 | 72.7[c] |
| R4—Single-family residential use at the southeast corner of Croydon Avenue and Kittyhawk Avenue, south of the Project Site | 300 | 55.6 | 52.5 | 58.0[c] |

*CNEL = Community Noise Equivalent Level*

*dBA = A-weighted sound pressure level in decibel*

*$L_{eq}$ = equivalent sound level*

[a] *Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site.*

[b] *The range of hours for the daytime and nighttime periods shown herein are defined by the LAMC. For receptor locations R2, R3 and R4, daytime ambient noise levels were measured between 10:00 A.M. and 12:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 12:00 A.M.*

[c] *Estimated based on short-term (15-minute) noise measurements per FTA procedures.*

*Source: AES, 2024.*

equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly $L_{eq}$) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[143] These noise levels are typically associated with multiple pieces of equipment operating simultaneously. The construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of

[143] *Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, page 7, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.*

6.0 dBA for each doubling of distance.[144] Additional noise attenuation was assigned as the line-of-sight to the Project Site would be interrupted by the presence of existing intervening structures.[145]

Table 22 on page 292 provides the estimated on-site construction noise levels at the off-site noise sensitive receptors. The on-site construction noise levels are mainly due to the large construction equipment (e.g., excavator, grader, drill rig) at the ground levels. Construction activities take place at the upper levels of the Project buildings would involve smaller construction equipment (i.e., hand tools), which would generate lower noise levels than the large construction equipment at the ground level. Furthermore, Project construction at the upper floors, such as fit-out constructions, occur, normally, when the building exterior walls are in-place, which would minimize transmission of construction noise to the exterior. As indicated in Table 22, the estimated construction noise levels would exceed the significance criteria at off-site receptors R1 and R2 by 1.4 and 6.6 dBA, respectively. Therefore, the Project's potential noise impacts due to on-site construction would be significant prior to mitigation.

**Off-Site Construction Traffic**

In addition to on-site construction noise, the Project would generate mobile noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the Project's construction. Construction delivery/haul trucks would travel on approved truck routes between the Project Site and the San Diego Freeway (I-405). Incoming trucks would travel from the I-405, exit onto La Tijera Boulevard, heading west, to the Project site. Departing trucks would exit the Project site onto La Tijera Boulevard, heading east, to the I-405 Freeway.

In addition to the construction trucks, construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, which would not overlap with the Project construction equipment or trucks. Noise levels from construction trucks would be higher than those of construction workers vehicles. Therefore, the noise impacts are based on the construction trucks. Table 23 on page 293 provides the estimated number of construction-related truck trips and the estimated noise levels along the anticipated truck route. As indicated in Table 23, the estimated off-site construction noise levels would be below the significance criteria along the anticipated haul routes. Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant, and no mitigation is required.

[144] *Caltrans, Technical Noise Supplement (TeNS), September 2013, Chapter 2.1.4.1.*

[145] *Caltrans, Technical Noise Supplement (TeNS), September 2013, Figure 2-15f.*

**Table 22**
**Construction Noise Levels**

| Receptor Location | Calculated Construction Noise Levels by Phase,[a] CNEL (dBA) | | | | | Existing Daytime Ambient Noise Levels (Leq (dBA)) | Significance Criteria ($L_{eq}$ (dBA))[a] | Maximum Noise Exceedance Above the Criteria ($L_{eq}$ (dBA)) | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|
| | Demo. | Grading | Foundation | Building Construction | Paving | | | | |
| R1 | 79.4 | 79.0 | 77.7 | 77.3 | 79.0 | 73.0 | 78.0 | 1.4 | Yes |
| R2 | 79.4 | 79.0 | 77.7 | 77.3 | 79.0 | 67.8 | 72.8 | 6.6 | Yes |
| R3 | 66.4 | 68.0 | 66.8 | 66.1 | 66.2 | 71.3 | 76.3 | 0.0 | No |
| R4 | 55.5 | 56.6 | 55.4 | 54.7 | 55.2 | 55.6 | 60.6 | 0.0 | No |

[a] *Significance criteria are equivalent to the measured daytime ambient noise levels plus 5 dBA, per the L.A. CEQA Thresholds Guide for construction activities lasting longer than 10 days in a three-month period.*

*Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

**Table 23**
**Off-Site Construction Truck Noise Levels**

| Construction Phase | Estimated Number of Construction Truck Trips per Day | Estimated Number of Construction Truck Trips per Hour[a] | Estimated Truck Noise Levels Plus Ambient Along the Project Truck Route,[b] ($L_{eq}$ (dBA)) (Project/Project + Ambient) |
|---|---|---|---|
| | | | La Tijera Boulevard |
| Demolition | 40 | 7 | 57.9/73.1 |
| Grading/Excavation | 260 | 44 | 65.9/73.8 |
| Building Foundation | 40 | 5 | 56.4/73.1 |
| Building Construction | 40 | 5 | 56.4/73.1 |
| Paving/Landscape | 10 | 2 | 52.4/73.1 |
| Existing Daytime Ambient Noise Levels along the Project Haul Routes,[c] $L_{eq}$ (dBA) | | | 73.0 |
| Significance Criteria,[d] $L_{eq}$ (dBA) | | | 78.0 |
| Maximum Noise Exceedance Above the Criteria, $L_{eq}$ (dBA) | | | 0.0 |
| Significance Impact? | | | No |

[a] *Haul truck hourly trips are based on 6-hour per day. Other delivery trucks are based on 8-hour per day.*
[b] *Noise levels include Project-related truck trips plus ambient.*
[c] *Ambient noise levels along La Tijera Boulevard is based on measured noise level at receptor R1.*
[d] *Significance criteria are equivalent to the measured ambient noise levels plus 5 dBA.*
*Detail calculation worksheets are included in Appendix I of this SCEA.*
*Source: AES, 2024.*

## On-Site Operational Noise

### Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the roof level of the new buildings. Project-related outdoor mechanical equipment would be designed to comply with the City's Noise Regulations (Section 112.02 of the LAMC) to ensure that it would not increase the existing ambient noise levels by 5 dBA. Table 24 on page 294 presents the estimated on-site mechanical equipment noise levels associated with this equipment at the off-site receptor locations. As shown on Table 24, the estimated noise levels from the mechanical equipment would be well below the existing ambient noise levels. As such, the Project's noise levels due to the mechanical equipment at the off-site receptor locations would be below the significance threshold of 5 dBA ($L_{eq}$) above existing ambient noise levels. Therefore, noise impacts from the Project's mechanical equipment would be less than significant, and no mitigation is required.

**Table 24**
**Mechanical Equipment Noise Levels**

| Receptor Location | Existing Ambient Noise Levels, dBA ($L_{eq}$) | Estimated Noise from Project Mechanical Equipment, dBA ($L_{eq}$) | Ambient + Project Noise Levels, dBA ($L_{eq}$) | Significance Threshold,[a] dBA ($L_{eq}$) | Exceedance over Significance Criteria | Sig. Impact? |
|---|---|---|---|---|---|---|
| R1 | 69.5 | 34.8 | 69.5 | 74.5 | 0.0 | No |
| R2 | 64.7 | 33.9 | 64.7 | 69.7 | 0.0 | No |
| R3 | 66.7 | 32.8 | 66.7 | 71.7 | 0.0 | No |
| R4 | 52.5 | 35.6 | 52.6 | 57.5 | 0.0 | No |

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

*Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

### Outdoor Spaces

The Project would include several outdoor spaces, including the plaza at Level 1, courtyard at Level 3, and terraces at Level 5, Level 6 Level 7, and Level 8. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. However, in accordance with recent case law, noise generated by the Project residents and their guests is not a significant impact under CEQA.[146] Therefore, noise levels associated with people gathering and conversing are not included in the noise analysis.

An additional potential noise source associated with outdoor spaces would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system) at the outdoor spaces. The amplified sound system for use in outdoor areas would be designed so as not to exceed the maximum noise level of 80 dBA $L_{eq}$ at a distance of 15 feet from the face of the loudspeakers, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA $L_{eq}$) at any off-site noise sensitive receptor location. Table 25 on page 295 presents the estimated noise levels from the Project's outdoor areas at the off-site sensitive receptors, resulting from the use of amplified sound at the outdoor areas. As presented in Table 25, the estimated noise levels from the amplified sound at the outdoor spaces would range from 46.3 dBA ($L_{eq}$) at off-site receptor location R3 to 54.3 dBA ($L_{eq}$) at receptor location R4, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, the Project's potential noise impacts from the outdoor uses would be less than significant, and no mitigation is required.

[146] *California Assembly Bill No. 1307, Approved by Governor September 07, 2023.*

**Table 25**
**Estimated Noise Levels from Outdoor Spaces**

| Receptor Location | Existing Ambient Noise Levels, dBA ($L_{eq}$) | Estimated Noise from Outdoor Spaces, dBA ($L_{eq}$) | Ambient + Project Noise Levels, dBA ($L_{eq}$) | Significance Threshold,[a] dBA ($L_{eq}$) | Exceedance over Significance Criteria | Significant Impact? |
|---|---|---|---|---|---|---|
| R1 | 69.5 | 51.5 | 69.6 | 74.5 | 0.0 | No |
| R2 | 64.7 | 47.9 | 64.8 | 69.7 | 0.0 | No |
| R3 | 66.7 | 46.3 | 66.7 | 71.7 | 0.0 | No |
| R4 | 52.5 | 54.3 | 56.6 | 57.5 | 0.0 | No |

[a] *Significance thresholds are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA.*

*Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

### Parking

The Project includes approximately 549 total vehicular parking spaces, which would be located within two subterranean levels and in Levels 1 and 2 of the proposed building. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Since the parking structure would be fully enclosed on all sides, with the exception of the entrance/exit at the west and south side of the Project Site, noise generated within the enclosed parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Therefore, noise impacts from the parking garage would be less than significant. Therefore, the Project's potential noise impacts from parking operations would be less than significant, and no mitigation is required.

### Off-Site Operational (Traffic) Noise

Off-site roadway noise was analyzed using the FHWA TNM model and traffic data from the Project's Transportation Assessment, which is included as Appendix K.1 of this SCEA.[147] The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor. Roadway noise conditions without the Project ("Future without Project") were calculated and compared to noise levels that would occur with implementation of the Project ("Future Plus Project") to determine Project-related noise impacts for operational off-site roadway noise. Table 26 on page 296 presents the off-site traffic noise impacts for the Future plus Project condition. As indicated in Table 26, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria.

[147] *Federal Highway Administration, Traffic Noise Model (TNM) Version 2.5,*

**Table 26**
**Off-Site Roadway Traffic Noise Impacts—Future Plus Project**

| Roadway Segment | Adjacent Land Use | Calculated Traffic Noise Levels,[a] CNEL (dBA) | | Increase in Noise Levels due to Project, dBA (CNEL) | Significant Impact? |
|---|---|---|---|---|---|
| | | Future Without Project | Future Plus Project | | |
| Sepulveda Boulevard | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential, Commercial | 73.4 | 73.5 | 0.1 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 73.0 | 73.0 | 0.0 | No |
| – Between La Tijera Blvd. and Westchester Pkwy. | Commercial | 73.6 | 73.6 | 0.0 | No |
| Truxton Avenue | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential | 64.6 | 64.6 | 0.0 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 63.8 | 65.3 | 1.5 | No |
| Manchester Avenue | | | | | |
| – Between Kentwood Ave. and Sepulveda Blvd. | Residential, Commercial | 72.3 | 72.4 | 0.1 | No |
| – Between Sepulveda Blvd. and Truxton Ave. | Residential, Commercial | 71.7 | 71.9 | 0.2 | No |
| – Between Truxton Ave. and La Tijera Blvd. | Residential, Commercial | 71.8 | 71.9 | 0.1 | No |
| – Between La Tijera Blvd. and Airport Blvd. | Residential, Religious | 71.7 | 71.8 | 0.1 | No |
| La Tijera Boulevard | | | | | |
| – Between Sepulveda Blvd. and Sepulveda Eastway | Commercial | 69.7 | 69.9 | 0.2 | No |
| – Between Sepulveda Eastway and Truxton Ave. | Residential, Commercial | 70.1 | 70.3 | 0.2 | No |
| – Between Truxton Ave. and Manchester Blvd. | Residential, Commercial | 70.1 | 70.2 | 0.1 | No |
| – Between Manchester Blvd. and 83rd St. | Residential, Religious | 70.1 | 70.2 | 0.1 | No |

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

In addition, traffic noise impacts were also analyzed to determine the potential noise impacts based on the increase in noise levels due to the Project ("Existing Plus Project") compared with the existing without Project conditions ("Existing Without Project"). Table 27 on page 298 presents the off-site traffic noise impacts when compared with the existing conditions. As indicated in Table 27, the estimated increase in traffic-related noise levels along the analyzed roadway segments would be well below the 3-dBA and 5-dBA CNEL significance criteria. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

### Composite Noise Levels

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the off-site noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment and outdoor uses. Table 28 on page 299 presents the estimated composite noise from Project-related noise sources in terms of CNEL at the off-site noise sensitive receptors. As reported in Table 28, the composite noise levels from Project operation at the off-site receptor locations would be below the 3 dBA significance criteria criterion (applicable to receptors R1, R2 and R3) as the composite (Project plus Ambient) noise level falls within the normally unacceptable (70 to 75 CNEL) land use category and the 5 dBA significance criteria criterion (applicable to receptor R4) as the composite noise levels fall within the [conditionally acceptable (60 to 70 CNEL) land use category. Therefore, the composite noise level impacts due to Project operation would be less than significant.

**Table 27**
**Off-Site Roadway Traffic Noise Impacts—Existing Plus Project**

| Roadway Segment | Adjacent Land Use | Calculated Traffic Noise Levels,[a] CNEL (dBA) | | Increase in Noise Levels due to Project, dBA (CNEL) | Significant Impact? |
|---|---|---|---|---|---|
| | | Existing Conditions | Existing Plus Project | | |
| Sepulveda Boulevard | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential, Commercial | 73.2 | 73.2 | 0.0 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 72.7 | 72.7 | 0.0 | No |
| – Between La Tijera Blvd. and Westchester Pkwy. | Commercial | 73.1 | 73.2 | 0.1 | No |
| Truxton Avenue | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential | 64.5 | 64.5 | 0.0 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 63.7 | 65.2 | 1.5 | No |
| Manchester Avenue | | | | | |
| – Between Kentwood Ave. and Sepulveda Blvd. | Residential, Commercial | 72.0 | 72.1 | 0.1 | No |
| – Between Sepulveda Blvd. and Truxton Ave. | Residential, Commercial | 71.4 | 71.6 | 0.2 | No |
| – Between Truxton Ave. and La Tijera Blvd. | Residential, Commercial | 71.5 | 71.6 | 0.1 | No |
| – Between La Tijera Blvd. and Airport Blvd. | Residential, Religious | 71.2 | 71.3 | 0.1 | No |
| La Tijera Boulevard | | | | | |
| – Between Sepulveda Blvd. and Sepulveda Eastway | Commercial | 69.0 | 69.2 | 0.2 | No |
| – Between Sepulveda Eastway and Truxton Ave. | Residential, Commercial | 69.6 | 69.8 | 0.2 | No |
| – Between Truxton Ave. and Manchester Blvd. | Residential, Commercial | 69.5 | 69.7 | 0.2 | No |
| – Between Manchester Blvd. and 83rd St. | Residential, Religious | 69.8 | 69.9 | 0.1 | No |

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

**Table 28**
**Composite Noise Levels**

| Receptor Location | Existing Ambient Noise Levels (CNEL (dBA)) | Calculated Project-Related Noise Levels,[a] CNEL (dBA) | | | Project Composite Noise Levels (CNEL (dBA)) | Ambient Plus Project Composite Noise Levels (CNEL (dBA)) | Increase in Noise Levels due to Project (CNEL (dBA)) | Significance Criteria[b] (CNEL (dBA)) | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|
| | | Traffic | Mechanical | Outdoor Spaces | | | | | |
| R1 | 77.1 | 56.2 | 41.5 | 53.6 | 58.3 | 77.2 | 0.1 | 80.1 | No |
| R2 | 70.2 | 55.2 | 40.6 | 50.3 | 56.5 | 70.4 | 0.2 | 73.2 | No |
| R3 | 72.7 | 54.9 | 39.5 | 48.7 | 55.9 | 72.8 | 0.1 | 75.7 | No |
| R4 | 58.0 | 36.1 | 42.3 | 56.7 | 56.9 | 60.5 | 2.5 | 63.0 | No |

[a] *Detail calculation worksheets are included in Appendix I of this SCEA.*

[b] *Significance criteria are equivalent to the existing ambient plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories or ambient plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance criteria, a noise impact is identified.*

*Source: AES, 2024.*

### Mitigation Measures

As analyzed above, construction of the Project would have the potential to result in significant noise impacts at the off-site sensitive receptor locations from on-site construction activities. Therefore, the following mitigation measure is provided to reduce construction-related noise impacts:

**NOI-MM-1:** Prior to commencement of construction, the Project Applicant shall erect temporary and impermeable sound barriers at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. The temporary sound barriers shall be in place for the duration of the Project construction, from demolition through building exterior wall/window enclosure. The temporary sound barriers shall be opaque and have a minimum Sound Transmission Class (STC) rating of 25.

- Within the southern portion of the Project Site between the construction areas and residential uses on the south side of La Tijera Boulevard (receptor location R1). The temporary sound barrier shall be designed with a minimum of 6 feet tall and to provide a minimum 5-dBA dBA noise reduction at the ground and upper levels of receptor location R1. The temporary sound barrier shall be designed to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor location R1.
- Within the northern portion of the Project Site between the construction areas and the residential uses on the north side of Manchester Avenue (receptor location R2). The temporary sound barrier shall be designed with a minimum of 8 feet tall and to provide a minimum 7-dBA noise reduction at the ground and upper levels of the residential uses at receptor location R2. The temporary sound barrier shall be designed to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor location R2.

Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels at the relevant receptors. Table 29 on page 301 shows the estimated on-site construction noise levels at the off-site sensitive receptors with implementation of Mitigation Measure NOI-MM-1. As indicated therein, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses to below the 5-dBA significance threshold. As such, the Project would not result in 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. Impacts would be less than significant with mitigation.

### Conclusion

Based on the above, potential noise impacts associated with the Project construction and operation would be less than significant.

**Table 29**
**Construction Noise Levels—With Mitigation Measure**

| Receptor Location | Calculated Construction Noise Levels by Phase,[a] CNEL (dBA) | | | | | Existing Daytime Ambient Noise Levels (Leq (dBA)) | Significance Criteria ($L_{eq}$ (dBA))[a] | Maximum Noise Exceedance Above the Criteria ($L_{eq}$ (dBA)) | Significant Impact? |
|---|---|---|---|---|---|---|---|---|---|
| | Demo. | Grading | Foundation | Building Construction | Paving | | | | |
| R1 | 74.4 | 74.0 | 72.7 | 72.3 | 74.0 | 73.0 | 78.0 | 0.0 | No |
| R2 | 72.4 | 72.0 | 70.7 | 70.3 | 72.0 | 67.8 | 72.8 | 0.0 | No |
| R3 | 66.4 | 68.0 | 66.8 | 66.1 | 66.2 | 71.3 | 76.3 | 0.0 | No |
| R4 | 55.5 | 56.6 | 55.4 | 54.7 | 55.2 | 55.6 | 60.6 | 0.0 | No |

[a] *Significance criteria are equivalent to the measured daytime ambient noise levels plus 5 dBA, per the L.A. CEQA Thresholds Guide for construction activities lasting longer than 10 days in a three-month period.*

*Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

**b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant**

**On-Site Construction Vibration Impacts**

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities. Heavy construction equipment (e.g. a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. As discussed in the Project's Historical Resources Technical Report,[148] the nearest off-site historical resource includes the Westchester Triangle Commercial Historic District, which is located across Truxton Avenue. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site (i.e., within 20 feet related to building damage).[149] Specifically, heavy construction equipment such as a large bulldozer would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[150] With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration (such as historic structures) to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings.[151] Table 30 on page 303 provides the estimated vibration levels at the nearest off-site buildings. As indicated in Table 30, the estimated vibration velocity levels from construction equipment would be below the significance criteria of 0.12 PPV for the buildings within the Westchester Triangle Commercial Historic District (to the west), the 0.2 PPV (inch/second) criteria applicable to the residential buildings to the north and the 0.3 PPV (inch/second) criteria applicable to the commercial buildings to the east of the Project Site. As such, the Project's potential vibration impacts with respect to on-site construction activities would be less than significant, and no mitigation is required.

**Off-Site Construction Vibration Impacts**

Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route. Based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. There are existing buildings along the Project's anticipated haul route, La Tijera Boulevard, that are situated approximately 25 feet from the truck travel lane and would be exposed to ground-borne vibration levels of approximately 0.016 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts pursuant to the

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[148] *Historic Resources Group, Historical Resources Assessment Report, October 2024. See Appendix C of this SCEA.*

[149] *Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage.*

[150] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4.*

[151] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5.*

**Table 30**
**Construction Vibration Impacts—Building Damage**

| Receptor Location | Estimated Vibration Velocity Levels at the Off-Site Buildings, PPV,[a] | | | | | Significance Threshold, PPV | Significant Impacts? |
|---|---|---|---|---|---|---|---|
| | Large Bulldozer | Caisson Drilling | Loaded Trucks | Jack-hammer | Small Bulldozer | | |
| FTA Reference Vibration Levels at 25 feet | 0.089 | 0.089 | 0.076 | 0.035 | 0.003 | — | — |
| One- and Two-Story residential buildings north of the Project Site | 0.011 | 0.011 | 0.010 | 0.004 | 0.000 | 0.2[b] | No |
| One- and Two-Story residential buildings south of the Project Site | 0.011 | 0.011 | 0.010 | 0.004 | 0.000 | 0.2[b] | No |
| One-Story commercial buildings east of the Project Site | 0.200 | 0.200 | 0.170 | 0.079 | 0.007 | 0.3[c] | No |
| One-Story commercial buildings west of the Project Site (historic structures within the Westchester Triangle Commercial Historic District) | 0.024 | 0.024 | 0.020 | 0.009 | 0.001 | 0.12[d] | No |

[a] *Vibration level calculated based on FTA reference vibration level at 25 foot distance.*

[b] *Significance threshold is based on FTA criteria for non-engineered timber and masonry buildings.*

[c] *Significance threshold is based on FTA criteria for engineered concrete and masonry buildings.*

[d] *Significance threshold is based on FTA criteria for buildings extremely susceptible to vibration damage.*

*Source: FTA, 2018; AES, 2024.*

thresholds of significance for building damage from off-site construction activities (i.e., construction trucks traveling on public roadways) would be less than significant, and no mitigation is required.

### Operational Groundborne Vibration

The Project's day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking garage. Groundborne vibration from passenger vehicles would be similar to that generated by the Project Site's existing commercial uses and associated surface parking areas. Furthermore, the off-site sensitive uses are located minimum 100 feet from the Project Site. Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the off-site sensitive receptors would be well below the perceptible level. Therefore, the Project would not result in the generation of excessive groundborne vibration levels at sensitive receptors in the vicinity of the Project site. As such, vibration impacts associated with operation of the Project would be below

the significance threshold and impacts would be less than significant, no mitigation measures would be required.

### Conclusion

Based on the above, groundborne vibration and groundborne noise impacts associated with the Project would be less than significant, and no mitigation is 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.** The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The Project Site is located approximately 1.5 miles from LAX. However, based on a report published by LAX, the Project Site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project site.[152] Thus, the Project would not expose people residing or working in the vicinity of the Project Site to excessive airport-related noise levels. ***Therefore, impacts with respect to Threshold (c) would be less than significant.***

### Cumulative Impacts

**Less Than Significant Impact.** The Project, together with the related projects and future growth, could contribute to cumulative noise and vibration impacts. The potential for cumulative noise and vibration impacts to occur is specific to the distance between each related project and their stationary noise sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

#### Construction Noise

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the L.A. CEQA Thresholds Guide screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can potentially contribute to a cumulative noise impact for receptors located midway between the two construction sites. There are seven related projects located in the vicinity of the Project Site. Related Project No. 1, Related Project No. 2, Related Project No. 5, Related Project No. 6, and Related Project No. 7 are located more than 2,000 feet from the Project and therefore would not contribute to potential cumulative on-site construction noise impacts. The following two related projects are located within 1,000 feet of the Project Site, and could potentially contribute to cumulative construction noise impacts.

- Related Project No. 3 (a middle school development) is located at 8540 Manchester Avenue, approximately 490 feet northeast of the Project Site. There are residential uses located along the north side of Manchester Avenue (receptor R2), between the Project and the

[152] *Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map.*

Related Project No. 3. Receptor R2 is approximately 500 feet west of Related Project No. 3 and is also shielded from Related Project No. 3 by the existing buildings located along the north side Manchester Avenue. Therefore, construction noise levels from the Related Project No. 3 would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with the Project.

- Related Project No. 4 (residential development) is located at 8521 Sepulveda Boulevard, approximately 950 feet northwest of the Project Site. There are residential uses located along the north side of Manchester Avenue, between the Project and the Related Project No. 4. However, the Related Project No. 4 is shielded from the Project Site by the existing buildings located along the north side of Manchester Avenue. As such, construction noise levels from the Project and this related project would be shielded from each other. Therefore, due to distance attenuation and noise reduction provided by intervening buildings, the Project would not contribute to cumulative construction-related noise impacts in the event of concurrent construction with Related Project No. 4.

Based on the above, there would be no potential cumulative noise impacts at the nearby sensitive uses located in proximity to the Project Site and nearby related projects. As such, cumulative noise impacts associated with on-site construction would be less than significant.

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. Based on the existing daytime ambient noise level of 73.0 dBA ($L_{eq}$) along La Tijera Boulevard (measured at receptor R1), it is estimated that a net increase of 494 haul truck trips per hour along La Tijera Boulevard would be required to increase the ambient noise levels by 5 dBA and exceed the significance criteria.[153] As indicated above, the Project would generate up to 44 haul truck trips per hour in connection with its proposed excavation phase. Related Project No. 3 could also potentially utilize La Tijera Boulevard as haul route. However, Related Project No. 3 is located on a smaller development site than the Project Site and therefore the potential construction of Related Project No. 3 is extremely unlikely to generate up to 450 haul truck trips per hour. Therefore, the potential cumulative increase in total truck trips is not anticipated to reach 494 truck trips per hour along La Tijera Boulevard. As such, cumulative off-site construction noise impacts would be less than significant.

### Operational Noise

The Project Site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, each of the related projects that have been identified in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects are of a residential, retail, or commercial, and these uses are not typically associated with excessive exterior noise levels. However, each project would produce traffic volumes that are capable of

[153] *It is estimated that with 494 truck trips, the noise level along La Tijera Boulevard would be 76.4 dBA, when added to the existing ambient of 73.0 dBA the cumulative noise levels would be 78.0 dBA, which would increase the ambient by 5.0 dBA.*

generating roadway noise impacts. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

Due to provisions set forth in the LAMC that limit stationary source noise from items, such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as discussed above, noise impacts associated with operations within the Project Site would be less than significant. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from "Existing" conditions to "Future Plus Project" conditions to the applicable significance criteria. Table 31 on page 307 presents the cumulative off-site traffic noise impacts. As indicated in Table 31, the estimated increase in traffic-related noise levels due to cumulative traffic volumes would result in a maximum noise increase of 1.6 dBA along the roadway segment of Truxton Avenue (between Manchester Avenue and La Tijera Boulevard), which would be well below the 5-dBA CNEL significance criteria. The cumulative traffic noise increase at other analyzed roadway segments would be 0.9 dBA or lower. Therefore, off-site traffic noise impacts associated with the cumulative traffic would be less than significant.

### Construction Vibration

Ground-borne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 20 feet as related to building damage).[154] The nearest related project is Related Project No. 3, which is located approximately 490 feet from the Project Site. Therefore, due to the rapid attenuation characteristics of ground-borne vibration, Related Project No. 3 would not contribute to potential cumulative construction vibration impacts. Therefore, the cumulative construction vibration impact with respect to building damage associated with on-site construction would be less than significant.

Trucks from the related projects are expected to generate similar ground-borne vibration levels as the Project along the anticipated haul route, i.e., La Tijera Boulevard. As analyzed above, vibration levels generated by haul trucks along the haul route would be below the significance criteria for building damage. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul routes would be below the building damage significance criteria of 0.12 PPV (for buildings extremely susceptible to vibration). Therefore, the cumulative vibration impact from off-site construction would be less than significant.

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[154] *Distances calculated based on estimated vibration levels for typical construction equipment at a distance which would be below the 0.12 PPV significance threshold applicable to buildings extremely susceptible to vibration damage (i.e., historic structures).*

**Table 31**
**Cumulative Off-Site Roadway Traffic Noise Impacts**

| Roadway Segment | Adjacent Land Use | Calculated Traffic Noise Levels,[a] CNEL (dBA) | | Increase in Noise Levels due to Cumulative Traffic, dBA (CNEL) | Significant Impact? |
|---|---|---|---|---|---|
| | | Existing Conditions | Future Cumulative Plus Project | | |
| Sepulveda Boulevard | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential, Commercial | 73.2 | 73.5 | 0.3 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 72.7 | 73.0 | 0.3 | No |
| – Between La Tijera Blvd. and Westchester Pkwy. | Commercial | 73.1 | 73.6 | 0.5 | No |
| Truxton Avenue | | | | | |
| – Between 83rd St. and Manchester Ave. | Residential | 64.5 | 64.6 | 0.1 | No |
| – Between Manchester Ave. and La Tijera Blvd. | Commercial | 63.7 | 65.3 | 1.6 | No |
| Manchester Avenue | | | | | |
| – Between Kentwood Ave. and Sepulveda Blvd. | Residential, Commercial | 72.0 | 72.4 | 0.4 | No |
| – Between Sepulveda Blvd. and Truxton Ave. | Residential, Commercial | 71.4 | 71.9 | 0.5 | No |
| – Between Truxton Ave. and La Tijera Blvd. | Residential, Commercial | 71.5 | 71.9 | 0.4 | No |
| – Between La Tijera Blvd. and Airport Blvd. | Residential, Religious | 71.2 | 71.8 | 0.6 | No |
| La Tijera Boulevard | | | | | |
| – Between Sepulveda Blvd. and Sepulveda Eastway | Commercial | 69.0 | 69.9 | 0.9 | No |
| – Between Sepulveda Eastway and Truxton Ave. | Residential, Commercial | 69.6 | 70.3 | 0.7 | No |
| – Between Truxton Ave. and Manchester Blvd. | Residential, Commercial | 69.5 | 70.2 | 0.7 | No |
| – Between Manchester Blvd. and 83rd St. | Residential, Religious | 69.8 | 70.2 | 0.4 | No |

[a] *Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix I of this SCEA.*

*Source: AES, 2024.*

**Conclusion**

Based on the above, cumulative noise impacts associated with on-site and off-site construction noise, on-site and off-site operation noise, and on-site and off-site vibration would be less than significant.

# 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, Mitigation Measure PMM POP-1 from the 2020–2045 RTP/SCS PEIR is not applicable to the Project.

**SCAG 2024–2050 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 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 of existing ROWs, wherever feasible.

c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between ROW 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, Mitigation Measure PMM POP-1 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**Impact Analysis**

**a. Would the project 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.** The Project would include the development of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. The construction of new residential units would increase the residential population within the Project Site and vicinity.

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. With regard to future growth, SCAG's 2020–2045 RTP/SCS provides population, housing, and employment projections for cities under its jurisdiction through 2045. The growth projections in the 2020–2045 RTP/SCS reflects the 2017 American Community Survey, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, and extensive input from local jurisdictions in SCAG's planning area. On April 4, 2024, SCAG's Regional Council adopted the 2024–2050 RTP/SCS, which provides population, housing, and employment projections for cities under

its jurisdiction through 2050. The growth projections in the 2024–2050 RTP/SCS reflects the 2020 Census, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, American Community Survey, and extensive input from local jurisdictions in SCAG's planning area.[155] The Project Site is located in SCAG's City of Los Angeles Subregion.

### Population

According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2024 is approximately 4,164,834 persons.[156] As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,309,231 persons in 2029, the projected occupancy year of the Project.[157] Therefore, the projected population growth between 2024 and 2029 is approximately 144,397 persons. Based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 1,159 residents.[158] The estimated 1,159 new residents generated by the Project would represent approximately 0.80 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2024 and 2029. The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

According to SCAG's 2024–2050 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2024 is approximately 3,969,450 persons.[159] As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,031,700 persons in 2029, the projected occupancy year of the Project.[160] Therefore, the projected population growth between 2024 and 2029 is approximately 62,250 persons. Based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 1,159 residents.[161] The estimated 1,159 new residents generated by the Project would represent approximately 1.86 percent of the population growth forecasted by SCAG's 2024–2050 RTP/SCS in the City of Los Angeles Subregion between 2024 and 2029. The Project does not include the extension of

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[155] *SCAG formally adopted the 2024–2050 RTP/SCS in April 2024. The 2024–2050 RTP/SCS has yet to be adopted by CARB. As such, both SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS are considered in this discussion.*

[156] *Based on a linear interpolation of SCAG's 2016–2045 data, the 2024 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2024.*

[157] *Based on a linear interpolation of SCAG's 2016–2045 data, the 2029 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2029.*

[158] *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.*

[159] *Based on a linear interpolation of SCAG's 2019–2050 data, the 2024 values for population are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2024.*

[160] *Based on a linear interpolation of SCAG's 2019–2050 data, the 2029 values for population are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2029.*

[161] *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.*

roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be well within SCAG's 2024–2050 population projection for the City of Los Angeles Subregion.

### Housing

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2024 is approximately 1,484,517 households.[162,163] As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,557,966 households in 2029, the projected occupancy year of the Project.[164] Therefore, the projected household growth in the City between 2024 and 2029 is approximately 73,448 households. The Project's 489 residential households added by the Project would constitute approximately 0.67 percent of the housing growth forecasted between 2024 and 2029 by SCAG's 2020–2045 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project's households would be well within SCAG's 2020–2045 household projection for the City of Los Angeles Subregion.

According to the 2024–2050 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2024 is approximately 1,492,600 households.[165,166] As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,586,600 households in 2029, the projected occupancy year of the Project.[167] Therefore, the projected household growth in the City between 2024 and 2029 is approximately 94,000 households. The Project's 489 residential households added by the Project would constitute approximately 0.52 percent of the housing growth forecasted between 2024 and 2029 by SCAG's 2024–2050 RTP/SCS. The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project's households would be well within SCAG's 2024–2050 household projection for the City of Los Angeles Subregion.

### Employment

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[162] *Based on a linear interpolation of SCAG's 2016–2045 data, the 2024 values for housing are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2024.*

[163] *SCAG forecasts "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.*

[164] *Based on a linear interpolation of SCAG's 2016–2045 data, the 2029 values for housing are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2029.*

[165] *Based on a linear interpolation of SCAG's 2019–2050 data, the 2024 values for housing are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2024.*

[166] *SCAG forecasts "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.*

[167] *Based on a linear interpolation of SCAG's 2019–2050 data, the 2029 values housing are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2029.*

In addition to the residential population, operation of the Project would generate new employment positions, which could result in increased population growth in the area. The Project's 16,120 square feet of ground-floor commercial space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail) would generate approximately 54 new employees based on employee generation rates developed by the LADOT.[168]

According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2024 is approximately 1,927,638 employees.[169] In 2029, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,977,224 employees in 2029, the projected occupancy year of the Project.[170] Therefore, the projected employment growth in the City between 2024 and 2029 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. Thus, the Project's estimated 54 new employees would constitute approximately 0.11 percent of the employment growth forecasted between 2024 and 2029.

According to the 2024–2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2024 is approximately 2,005,813 employees.[171] In 2029, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 2,057,625 employees in 2029, the projected occupancy year of the Project.[172] Therefore, the projected employment growth in the City between 2024 and 2029 based on SCAG's 2024–2050 RTP/SCS is approximately 51,813 employees. Thus, the Project's estimated 54 new employees would constitute approximately 0.10 percent of the employment growth forecasted between 2024 and 2029.

The provision of new jobs would constitute a small percentage of employment growth. It would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

***As analyzed above, the net 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***

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168 *Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 4 employees per 1,000 square feet of High-Turnover Sit-Down Restaurant and 2 employees per 1,000 square feet of "General Retail."*

169 *Based on a linear interpolation of SCAG's 2016–2045 data, the 2024 values for employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2024.*

170 *Based on a linear interpolation of SCAG's 2016–2045 data, the 2029 values for employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2029.*

171 *Based on a linear interpolation of SCAG's 2019–2050 data, the 2024 values for employment are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2024.*

172 *Based on a linear interpolation of SCAG's 2019–2050 data, the 2029 values for employment are calculated using SCAG's 2019 and 2035 values to find the average increase between years and then applying that annual increase to each year until 2029.*

***Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.***

**b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. ***Therefore, no impacts related to displacement of people or housing would occur.***

**Cumulative Impacts**

**Less Than Significant Impact.** The cumulative analysis takes into consideration the seven related projects within 1 mile of the Project Site (listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA). Of the related projects, three involve a mix of uses, including residential. However, these related projects are not of a scale that would result in an exceedance of SCAG's projection populations, as they would include a relatively small amount of housing units. Furthermore, as discussed above, the Project would not induce population growth beyond that included in SCAG's population projections contained in the 2020–2045 and 2024–2050 RTP/SCS. ***As such, the Project would not directly or indirectly contribute to significant cumulative impacts associated with population and housing, and 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 Mitigation Measure PMM PSP-1(c), from the 2020–2045 RTP/SCS PEIR, the Project would include Project Design Feature TR-PDF-1, which requires the preparation and implementation of a Construction 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-1 would be equal to or more effective than Mitigation Measure PMM PSP-1 from the 2020–2045 RTP/SCS PEIR, 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 Mitigation Measure PMM PSS-1 from the 2020–2045 RTP/SCS PEIR 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 regarding the payment of school fees would

be equal to or more effective than Mitigation Measure PMM PSS-1 from the 2020–2045 RTP/SCS PEIR, 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 the Project Applicant would be required to pay a per capita fee to the LAPL to be used to offset the Project's potential incremental increased demand for library facilities and services. As the existing regulatory requirement regarding the payment of a per capita fee would be equal to or more effective than Mitigation Measure PMM PSL-1 from the 2020–2045 RTP/SCS PEIR, this measure is not applicable to the Project.

**SCAG 2024–2050 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 or physically altered fire and police facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

a) Coordinate with fire and police protection services agencies to ensure that there are adequate facilities to maintain acceptable service ratios, response times or other performance objectives for fire and police protection services and that any required additional construction of buildings is incorporated into 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 for fire and police protection services facilities, as appropriate and applicable, to mitigate identified CEQA impacts.

***Applicability to the Project***

As analyzed below, existing facilities are capable of providing acceptable fire and police protection 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. Adherence to applicable regulatory measures would be equal to or more effective than Mitigation Measure PMM PSP-1 from the 2024–2050 RTP/SCS PEIR, and thus, it would not be applicable to the Project.

**PMM PS-2:** In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:

a) Where construction or expansion of school facilities is required to meet public school service ratios, support expansion of such facilities, for example by ensuring safe routes to schools.

***Applicability to the Project***

Consistent with Mitigation Measure PMM PS-2 from the 2024–2050 RTP/SCS PEIR 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 regarding the payment of school fees would be equal to or more effective than Mitigation Measure PMM PS-2 from the 2024–2050 RTP/SCS PEIR, this measure is not applicable to the Project.

**Impact Analysis**

**a. Fire Protection?**

**Less Than Significant Impact**. The analysis below relies on the following metrics from the LAFD to assess potential demands on fire protection and emergency medical services: the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels; response distances, emergency access, and response times; and fire flow requirements. The analysis is based, in part on information available on the LAFD website; information obtained through consultation with the LAFD in written correspondence dated September 23, 2022 (included as Appendix J.1 of this SCEA) and April 11, 2024 (included as Appendix J.2 of this SCEA), and the Utility Infrastructure Technical Report dated October 2024 (included as Appendix M.2 of this SCEA).

LAFD provides fire protection and emergency medical services for the Project Site. The Project Site is located within LAFD's West Bureau, which encompasses several communities, including, but not limited to Hollywood, Venice, West Los Angeles, Pacific Palisades, Westwood, and Silver Lake. In their written correspondence, LAFD identified two LAFD fire stations located within a 2-mile radius of the Project Site. The designated "first-in" station is Fire Station No. 5, located at 8900 South Emerson Avenue, approximately 1 mile southeast of the Project Site, which is the designated "first in" station. In addition, Fire Station No. 95 is located approximately 1.7 miles southeast of the Project Site.[173] Secondary fire stations that serve the Project Site include Fire Station No. 51, located at 10435 Sepulveda Boulevard approximately 2.1 miles from the Project Site; Fire Station No. 67, located at 5451 Playa Vista Drive approximately 2.9 miles from the Project Site; and Fire Station No. 62, located at 11970 Venice Boulevard approximately 4.4 miles from the Project Site.[174] According to LAFD, based on response

[173] *Written correspondence from Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2022. See Appendix J.1 of this SCEA.*

[174] *Written correspondence from Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2022. See Appendix J.1 of this SCEA.*

distance from existing fire stations, fire protection for the Project Site would be considered adequate.[175] As previously noted, the Project Site is not located in a Very High Fire Hazard Severity Zone.[176]

### Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 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.[177] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[178] Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage and management of hazardous materials. Thus, compliance with 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.

Project construction could also potentially impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, as discussed under Item XVII, Transportation, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Therefore, although construction activities would be short-term and temporary for the area, those activities could temporarily impact emergency access. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction would require a temporary closure of the sidewalks adjacent to the Project Site. A Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The plans would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits and would provide a detour plan and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit

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[175] *Written correspondence from Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2022. See Appendix J.1 of this SCEA.*

[176] *City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 4123-004-010 and -011.*

[177] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 24, 2024.*

[178] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 24, 2024.*

providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

***Thus, based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.***

### Operation

#### Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 5, the "first-in" station for the Project Site, located approximately 1 mile southeast of the Project Site. As such, as described below, Fire Station No. 5 falls within the required 1.0-mile engine company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency. The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. As discussed in Section 3, Project Description, of this SCEA, the Project involves the development of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. As discussed under Item XIV, Population and Housing, implementation of the Project would result in 1,159 new residents and 54 new employees, which would result in an increase in the on-site service population within the service area of Fire Station No. 5.

While the Project's residential and employee population would increase the demand for LAFD fire protection and emergency medical services, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communication systems etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. The Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new facilities. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, as confirmed in the written correspondence from the LAFD, the City and LAFD would continue to monitor the demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth. As such, Project impacts with regard to LAFD facilities and equipment would be less than significant.

### Response Distance, Emergency Access, and Response Times

As described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site, including emergency vehicle access, would be provided via one full-access driveway on Truxton Avenue and one full-access driveway on La Tijera Boulevard. The addition of Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties. However, the area surrounding the Project Site includes an established street system and, as discussed in the Transportation Assessment included as Appendix K.1 of this SCEA, traffic generated by the Project would not result in significant impacts to the Project area intersections. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site. Furthermore, the Project would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. Furthermore, 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, pursuant to California Vehicle Code (CVC) Section 21806.

Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and/or surrounding area. Furthermore, compliance with applicable City Building Code and Fire Code requirements regarding site access would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Therefore, emergency access to the Project Site and surrounding area would be provided and/or maintained, and Project impacts with regard to emergency access would be less than significant.

### Fire Flow

Fire flow to the Project would be required to meet City fire flow requirements. The City of Los Angeles Fire Code (LAMC Section 57.507.3.1) establishes fire flow standards by development type. As indicated by the LAFD in their written correspondence provided in Appendix J.1 of this SCEA, the required fire flow for the Project Site has been determined to be 6,000 to 9,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi), which corresponds to the Industrial and Commercial Category.

As discussed in the Utility Infrastructure Report included as Appendix M.2 of this SCEA, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated needs. Based on the completed IFFAR (included as Exhibit 3A of Appendix M.2 of this SCEA), the seven nearby fire hydrants flowing simultaneously can provide a combined 7,100 gpm. Therefore, based on the IFFAR, there is adequate fire flow and pressure available for the Project to comply with the fire flow requirements pursuant to LAMC Section 57.507.3.

As described above and in the Utility Infrastructure Report, there are currently seven existing fire hydrants located near the Project Site. The number and location of any additional fire hydrants that may be required would be determined as part of LAFD's fire/life safety plan review for the Project. Furthermore, the Project would incorporate a fire sprinkler suppression system in the proposed

buildings, which would be subject to LAFD review and approval during the design and permitting of the Project. This system would serve to reduce the Project's public hydrant demand. Per LAMC Section 94.2020.0, which adopts National Fire Protection Association (NFPA) standards, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. The Service Advisory Request (SAR) response from LADWP (refer to Exhibit 2 of the Utility Infrastructure Report) shows that the domestic and fire water service off Truxton Avenue has a static pressure of 67 psi and a flow of up to 1,400 gpm that can be delivered with a residual pressure of 46 psi. This confirms there is sufficient pressure to serve the Project. Thus, as shown by the IFFAR and SAR, there is adequate water pressure available to operate the proposed fire sprinkler suppression system and otherwise meet the Project's fire flow requirements. As such, fire flow impacts to the LADWP's water infrastructure capacity would be less than significant. Therefore, with compliance with LAFD and LADWP requirements, the Project's impacts with regard to fire flow would be less than significant.

***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**

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis for fire protection is the service area of Fire Station No. 5. The increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire station would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As with the Project, the related projects and other future development projects in the vicinity would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.[179] Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified, and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the

[179] *City of Los Angeles, Proposed Budget for the Fiscal Year 2024-2025.*

impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Thus, ***compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

### b. Police Protection?

**Less Than Significant Impact.** The following analysis evaluates whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part on information available on the LAPD website as well as information obtained through consultation with the LAPD in written correspondence dated April 12, 2023 (included as Appendix J.3 of this SCEA) and April 3, 2024 (included as Appendix J.4 of this SCEA).

The Project Site is located within the West Bureau of the LAPD, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.[180] The West Bureau oversees operations in Hollywood, Olympic, Pacific, West Los Angeles, and Wilshire service areas as well as the West Traffic Division and West Bureau Homicide. The Project Site is located within the Pacific Area and is served by the Pacific Community Police Station.[181] The Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 2.7 miles northwest of the Project Site. The Pacific Community Police Station covers approximately 25.74 square miles and serves approximately 200,000 residents.[182] The Pacific Community Police Station has approximately 254 sworn officers and nine civilian support staff.[183] The average response time to calls for service in the Pacific Area was 5.9 minutes for high priority, emergency calls; 17.6 minutes for medium priority calls; and 31.6 minutes for lower priority, non-emergency calls.[184]

#### Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Pacific Area. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security

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[180] *LAPD, About West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed May 16, 2024.*

[181] *Written correspondence from LAPD, 6136 West Manchester Project, Request for Information, dated April 12, 2023. See Appendix J.3 of this SCEA.*

[182] *LAPD, About Pacific Community Police Station, www.lapdonline.org/lapd-contact/west-bureau/pacific-community-police-station/, accessed June 24, 2024.*

[183] *Written correspondence from LAPD, 6136 West Manchester Project, Request for Information, dated April 12, 2023. See Appendix J.3 of this SCEA.*

[184] *Written correspondence from LAPD, 6136 West Manchester Project, Request for Information, dated April 12, 2023. See Appendix J.3 of this SCEA.*

measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of this security measure, potential impacts associated with theft and vandalism during construction activities would be reduced.

Project-related construction vehicles would have the potential to increase emergency vehicle response times within the Pacific Area due to travel time delays caused by construction traffic. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as discussed under Item XVII, Transportation, of this SCEA, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the LADOT and may include narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as emergency vehicles have the ability to avoid traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Thus, impacts on police protection services during Project construction would be less than significant.

**Operation**

As discussed in Section 3, Project Description, of this SCEA, the Project involves the development of a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. Thus, the Project would introduce a new residential population to the Pacific area.[185]

As previously discussed, the Project Site is under the jurisdiction of the LAPD's Pacific Community Police Station, which is staffed by approximately 254 sworn officers and nine civilian support staff. The Pacific Community Police Station has a service population of approximately 200,000 residents. As discussed above under Item XIV, Population and Housing, implementation of the Project would result in 1,213 new persons, including 1,159 new residents and 54 new employees. This would increase the existing LAPD service population in the Pacific Area from approximately 200,000 persons to approximately 201,213 persons. With the increase in the police service population, the officer-to-resident ratio for the Pacific Area would be reduced from approximately one officer for every 787 residents[186] to approximately one officer for every 792 persons.[187] This ratio would continue to be higher

[185] *The LAPD considers the residential population within their service area to evaluate service capacity. However, in addition to the Project's residential population, this analysis also considers the Project's daytime employee population to provide a conservative analysis of Project-level impacts.*

[186] *200,000 residents ÷ 254 officers = 1 officer for every 787 residents.*

[187] *201,213 total Project daytime population ÷ 254 officers = 1 officer for every 792 persons.*

than the Citywide ratio of one officer for every 433 residents. However, the Project would not cause a substantial change in the officer-to-resident ratio for the Pacific Community Police Station.

As outlined below, Project Design Features POL-PDF-2 through POL-PDF-6 would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also design entrances to, and exits from, the building and open spaces areas, to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features would help offset the Project-related increase in demand for police services. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

The Project would introduce new uses to the Project Site that would generate additional traffic in the Project Site vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, based on the above analysis, the Project would not generate

a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project will not result in the need for new or altered police facilities.[188]

### Project Design Features

The Project would implement the following Project Design Features:

**POL-PDF-1:** During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

**POL-PDF-2:** The Project will include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas.

**POL-PDF-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building.

**POL-PDF-4:** The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.

**POL-PDF-5:** The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.

**POL-PDF-6:** Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

***Overall, 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

**Less Than Significant Impact.** The seven (7) related projects listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA fall within the boundaries of the Pacific Area, and three include residential uses. It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. 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, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any

[188] *Written correspondence from LAPD, 6136 West Manchester Project, Request for Information, dated April 12, 2023. See Appendix J.3 of this SCEA.*

new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. ***Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

**c. Schools?**

**Less Than Significant Impact.** The following analysis evaluates whether new or physically altered school facilities would be required to provide school services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on written correspondence with the Los Angeles Unified School District (LAUSD) dated August 12, 2024 (included as Appendix J.5 of this SCEA).

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD), which is divided into six local districts. The Project is located within the West Local District and is served by Westport Heights Elementary School (located at 6011 West 79th Street, approximately 0.56 mile from the Project Site), Katherine Johnson STEM Academy (located at 8701 Park Hill Drive, approximately 1.92 miles from the Project Site), Wright Middle School STEAM Magnet (located at 6550 West 80th Street, approximately 0.83 mile from the Project Site), and Westchester Enriched Sciences Magnets[189] (located at 7400 West Manchester Avenue, approximately 2.05 mile from the Project Site).[190,191]

As previously discussed, the Project would construct a new 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. As such, the Project would directly generate students through the construction of 489 residential uses. Based on LAUSD Student Generation rates, the Project would result in approximately 118 elementary students, 32 middle school students, and 65 high school students, for a total of approximately 214 students.[192] As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options that are not accounted for that may be available to Project-generated students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers, which are open to qualified students in the LAUSD;

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[189] *Westchester Enriched Sciences Magnets includes the Environmental & Natural Science Magnet, Gifted and High Ability STEAM Magnet, and the Health & Sports Medicine Magnet.*

[190] *LAUSD. LA Unified Region West Map, February 2023.*

[191] *Written correspondence from LAUSD, 6136 W. Manchester Project, Request for Information, dated August 12, 2024. See Appendix J.5 of this SCEA.*

[192] *Los Angeles Unified School District, 2024 Developer Fee Justification Study, February 2024, Table 3 and Table 14.*

- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;

- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and

- Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known childcare agency, private organization, or a verifiable child care provider.

Additionally, pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, 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. ***Overall, 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**

**Less Than Significant Impact.** Each of the seven (7) related projects within 1 mile of the Project Site are located within the boundaries of LAUSD, and three of the seven related projects would include a residential component. As discussed above, in accordance with SB 50, payment of developer impact fees 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, which would fully mitigate any potential impacts to school facilities. ***Therefore, cumulative impacts associated with schools would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

**d. Parks?**

**Less Than Significant Impact.** The following analysis evaluates the potential impacts of the Project on parks and recreational facilities. The analysis is based, in part, on written correspondence with the Los Angeles Department of Recreation and Parks (RAP) dated September 8, 2022 (included as Appendix J.6 of this SCEA) and April 2, 2024 (included as Appendix J.7 of this SCEA)

### Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population in the vicinity of the Project Site, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As such, there would be no impact related to construction activities, as construction workers would not demand and utilize parks services, and no facilities would be burdened such that new or expanded facilities would be required.

### Operation

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the RAP. Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site include: Westchester Recreation Center, located at 7000 West Manchester Avenue, approximately 1.35 miles from the Project Site.[193] There are currently no future plans for construction or expansion of parks and recreational facilities within a 2-mile radius of the Project Site.

As discussed in Section 3, Project Description, of this SCEA, the Project would include the development of a new approximately 416,915-square-foot mixed-use building comprised of 489 residential and live-work units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. An increase in the use of existing parks and recreational facilities is directly associated with an increase in the residential population. As outlined above under Item XIV, Population and Housing, development of the proposed 489 residential units would result in approximately 1,159 residents.

The Project would provide common and private open space areas throughout the Project Site totaling approximately 51,385 square feet, including approximately 43,235 square feet of common open space consisting of approximately 30,830 square feet of exterior common open space and approximately

[193] *Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 8, 2022. Included as Appendix J.6 of this SCEA.*

12,405 square feet of interior common open space; and 8,150 square feet of private open space, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4.

Overall, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents, visitors, and some of the new employees would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Additionally, compliance with regulatory requirements, including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant.

***Based on the above, 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. As such, the Project's potential impacts on parks would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** As listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA, there are seven related projects located within 1 mile of the Project Site. Three of the seven related projects include a residential component and would be required by the LAMC to provide open space for the proposed residential uses. As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. ***Therefore, overall, the cumulative impact associated with parks would be less than significant, and the Project's contributions to cumulative impacts would not be cumulatively considerable.***

**e. Other Public Facilities?**

**Less Than Significant Impact.** Other public facilities available include libraries. The following analysis evaluates whether new or physically altered library facilities would be required to provide library services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on library standards and capacity data provided by the Los Angeles Public Library

(LAPL) in correspondence dated May 15, 2023 (included as Appendix J.8 of this SCEA) and April 8, 2024 (included as Appendix J.9 of this SCEA)

The LAPL provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources. Based on information provided by the LAPL dated May 15, 2023, which is included in Appendix J.8 of this SCEA, the Project Site is located within the service areas of three library facilities including the Westchester–Loyola Village Branch Library, located at 7114 West Manchester Avenue, approximately 1.4 miles west of the Project Site; Playa Vista Branch Library, located at 6400 Playa Vista Drive, approximately 2 miles northwest of the Project Site; and Venice-Abbot Kinney Memorial Branch Library, located at 501 South Venice Boulevard, approximately 4.5 mile northwest of the Project Site.[194] As previously discussed, the Project would develop 489 new residential units. Based on the City's VMT Calculator Documentation, the Project could generate a new residential population of approximately 1,159 residents,[195] which could result in a direct demand for libraries. It is anticipated that a portion of the residential population generated by the Project that would visit library facilities would likely be dispersed among the various branch libraries serving the Project Site and it is not likely that all residents would visit the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.[196,197] The Project would also develop approximately 16,120 square feet of ground-floor commercial space (inclusive of 10,747 square feet of restaurant uses and 5,373 square feet of retail), which would generate approximately 54[198] new full-time and part-time positions; however, new positions would typically be filled by persons already residing in the vicinity of their workplace and who already generate a demand for the libraries in the vicinity of the Project Site. As such, any indirect or direct new demand for library services generated by employees of the proposed retail and restaurant uses would be negligible.

The Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that would help offset the Project-related increase in demand for library services; in addition, the Project would pay a per capita fee to the LAPL to further offset potential incremental demand. ***Therefore, with the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, the Project would not result in the need for new or altered facilities, the construction of which would cause significant***

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[194] *Written correspondence from LAPL, 6136 W. Manchester Project, Request for Information, dated May 15, 2023. See Appendix J.8 of this SCEA.*

[195] *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1.*

[196] *Denise A. Troll, How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.*

[197] *Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.*

[198] *Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 4 employees per 1,000 square feet of High-Turnover Sit-Down Restaurant and 2 employees per 1,000 square feet of "General Retail."*

***environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The residential population of a library's service area is the primary metric used by LAPL for assessing the adequacy of library services and planning for future growth (i.e., citing of new facilities). However, as noted above, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand when the recommended building size standards are not met and LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community. 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. Similar to the Project, the related projects in the area would be required to pay the required City fees. **Therefore, the cumulative impact associated with libraries would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.**

# 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 Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, the Project would comply with all regulatory compliance measures associated with maintaining parks and recreational facilities. The Project would also utilize sustainable development techniques and promote water efficiency, and promote infill development. Thus, while the Project would be consistent with the relevant measures of Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR, adherence to regulatory requirements (including the payment of park fees pursuant to LAMC Section 12.33) and implementation of elements of the Project would be equal to more effective than these measures, and no Project-specific impacts would occur. Thus, Mitigation Measure PMM REC-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into the Project.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM REC-1:** In accordance with provisions of CEQA Guidelines Sections 15091(a)(2) and 15126.4(a)(1)(B), 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 Mitigation Measure PMM REC-1 from the 2024–2050 RTP/SCS PEIR, the Project would comply with all regulatory compliance measures associated with maintaining parks and recreational facilities. The Project would also utilize sustainable development techniques and promote water efficiency, and promote infill development. Thus, while the Project would be consistent with the relevant measures of Mitigation Measure PMM REC-1 from the 2024–2050 RTP/SCS PEIR, adherence to regulatory requirements (including the payment of park fees pursuant to LAMC Section 12.33) and implementation of elements of the Project would be equal to more effective than these measures, and no Project-specific impacts would occur. Thus, Mitigation Measure PMM REC-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

**Impact Analysis**

**a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

**Less Than Significant Impact.** As discussed above under Item XV, Public Services, parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by RAP. Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site include: Westchester Recreation Center, located at 7000 West Manchester Avenue, approximately 1.35 miles from the Project Site.[199]

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. Specifically, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling 51,385 square feet, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. In particular, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and landscaping. The Project would also provide a dog park along the interior side-yard for residents. Open space accessible to the residents includes a 18,155-square-foot courtyard on Level 3 as well as open-air terraces on Levels 5, 6, 7, and 8. The courtyard would provide a swim club, which would feature a pool, spa, day beds, chaise lounges, cabanas as well as a garden, which would feature synthetic turf, lounge furnishings, lawn games, firepits, dining areas. The open-air terraces would feature a variety of amenities including, but not limited to, lounge seating, ping pong tables, fireplaces, and outdoor kitchens. The Project would also provide 1,840 square feet of co-

[199] *Written correspondence from Darryl Ford, Superintendent, and Cathie M. Santo Domingo, Assistant General Manager, Los Angeles Department of Recreation and Parks, September 8, 2022. Included as Appendix J.6 of this SCEA.*

working space on Level 1, 1,660 square feet of covered exterior open space on Level 3, and 7,005 square feet of recreation space on Levels 3 and 4.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, including publicly accessible open space, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. ***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?**

**Less Than Significant Impact.** As discussed above, the Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 51,385 square feet, which would exceed the requirements of the LAMC to provide a minimum of 51,100 square feet of open space. The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities and existing parks in the Project vicinity, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment, as discussed throughout this SCEA. ***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**

**Less Than Significant Impact.** The Project would not induce population growth beyond that included in the population projections for the City in SCAG's 2020–2045 RTP/SCS and 2024–2050 RTP/SCS, and thereby would not, directly or indirectly, contribute to significant cumulative impacts to recreation. Similar to the Project, the related projects in the area would be required to provide open space in accordance with the LAMC. Related projects may also be required to pay a Dwelling Unit Construction Tax, Park Fees pursuant to LAMC Section 12.33, or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. ***Therefore, the Project's contribution to cumulative impacts associated with recreation would not be cumulatively considerable, and impacts 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 Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR, the Project would incorporate TDM strategies. These TDM strategies, which include the provision of bicycle parking, would facilitate reductions in the Project's VMT, resulting in a less than significant impact. Thus, these Project-specific measures are more effective than Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR, and Mitigation Measure PMM TRA-1 from the 2020–2045 RTP/SCS PEIR 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 Management Plan, as outlined in Project Design Feature TR-PDF-1, which would ensure that adequate emergency access exists during construction. As existing regulatory requirements equal to or more effective than the Mitigation Measure PMM TRA-2 from the 2020–2045 RTP/SCS PEIR, it would not be incorporated into the Project.

**SCAG 2024–2050 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

For future land use development projects, lead agencies to encourage the incorporation of transit, bicycle, pedestrian, and micro-mobility facilities, features, and services in project designs, as well as encourage developers to provide information regarding the availability of these facilities and services to residents, tenants, and owners in order to facilitate increased access to and utilization of transit and active transportation services and facilities.

***Applicability to the Project***

As discussed below, the Project's potential impacts related to transportation would be less than significant. As such, Mitigation Measure PMM TRA-1 from the 2024–2050 RTP/SCS PEIR 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation impacts. 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 jurisdictions 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.

***Applicability to the Project***

Consistent with Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR, the Project would incorporate TDM strategies. These TDM strategies, which include the provision of bicycle parking, would facilitate reductions in the Project's VMT, resulting in a less than significant impact. Thus, these Project-specific measures are more effective than Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR, and Mitigation Measure PMM TRA-2 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

**PMM TRA-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider

mitigation measures to reduce substantial adverse effects related to transportation impacts. Such measures may include the following or other comparable measures identified by the lead agency:

Prepare a sight distance analysis as needed for locations where sight lines could be impeded. The sight distance analysis to be prepared according to the jurisdiction's applicable Municipal Code requirements and the Caltrans Highway Design Manual (HCM) standards and guidelines, and should recommend safety improvements as appropriate such as limited use areas (e.g., low-height landscaping), on-street parking restrictions (e.g., red curb), and any turning restrictions (e.g., right-in/right-out).

### *Applicability to the Project*

As discussed below, the Project's potential impacts related to transportation would be less than significant. As such, Mitigation Measure PMM TRA-3 from the 2024–2050 RTP/SCS PEIR is not applicable to the Project.

## Impact Analysis

*The following analysis is primarily based on the Transportation Assessment for the 6136 Manchester Avenue Residential Project (Transportation Assessment) that was prepared for the Project by Gibson Transportation Consulting, Inc. dated December 2022, revised August 2024, which is included as Appendix K.1 of this SCEA.*

**a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**Less Than Significant Impact.** Pursuant to the LADOT 2020 Transportation Assessment Guidelines (TAG), projects should be analyzed to identify potential conflicts with programs, policies, plans, or ordinances that are adopted to protect the environment. Pursuant to the TAG, in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT.[200] Each of the documents listed in the TAG (Table 2.1-1) was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance or non-conformance with each.

### Mobility Plan 2035

The Mobility Plan combines "complete street" principles with the following five goals that define the City's mobility priorities:

1. **Safety First:** Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.

[200] *Los Angeles Department of Transportation, Transportation Assessment Guidelines, July 2020.*

2. **World Class Infrastructure:** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.

3. **Access for All Angelenos:** A fair and equitable system much be accessible to all and must pay particularly close attention to the most vulnerable users.

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

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

The Mobility Plan identifies key corridors within the Project's transportation study area as components of various "mobility-enhanced networks." Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed consistent with the mobility-enhanced networks and would not impede the City's ability to implement improvements along the streets surrounding the Project Site.

The Mobility Plan also designates street and sidewalk width standards based on the functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right of way standards consistent with the Mobility Plan. Adjacent to the Project Site, La Tijera Boulevard and Manchester Avenue are both designated as Boulevard II, requiring a 55-foot half-right of way, and Truxton Avenue is a designated Local Street, requiring a 43-foot half-right of way. The Project would provide five-foot dedications along the Project Site frontages on La Tijera Boulevard and Manchester Avenue to meet the right of way widths required by the Mobility Plan. All other street frontages currently meet the Mobility Plan standards.

With regard to access, vehicular access to the Project's parking would be provided along Truxton Avenue and La Tijera Boulevard. The existing driveways on Manchester Avenue would be removed. The existing driveway on Truxton Avenue would be maintained, and the existing two driveways on La Tijera Boulevard would be consolidated into one proposed driveway. The new consolidated driveway would be designed in accordance with the regulatory standards and subject to the approval of LADOT and Bureau of Engineering. The Project would provide sufficient off-street parking to meet the City code parking requirements. On-street parking is currently provided and following construction of the Project, would be maintained along the Truxton Avenue and La Tijera Boulevard frontages.

The Project also supports initiatives of the Mobility Plan to create transit-oriented developments as it results in the construction of a residential mixed-use development on an infill site served by transit, supporting Metro ridership goals and enhancing transportation mobility. The Project is located in an urbanized area within proximity to transit stops, including a major transit stop at Sepulveda Boulevard and Manchester Avenue, that would encourage use of alternative transportation modes. The Project

includes pedestrian enhancements surrounding the Project Site, such as landscaping, sidewalk improvements, and pedestrian access to the Project Site.

Additionally, the Project would provide secured bicycle parking facilities. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure. In fact, the existing driveways on Manchester Avenue, a designated street within the bicycle enhanced network, would be removed. These measures would promote active transportation modes such as biking and walking. Furthermore, the Project's design features would further reduce vehicle trips and would result in lower VMT per capita and lower work VMT per employee compared to the average for the area.

As detailed in Appendix C of the Transportation Assessment and summarized above, the Project is consistent with all applicable policies of the Mobility Plan and the Project does not interfere with other policies identified in the Mobility Plan. Therefore, the Project is consistent with the Mobility Plan.

### Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of the Plan for a Healthy Los Angeles focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

A detailed analysis of the Project's consistency with the policies in the Plan for a Healthy Los Angeles is provided in Table 7 of the Transportation Assessment included as Appendix K.1 of this SCEA. In summary, the Project would promote healthy living where active travel modes are encouraged. The Project would support multi-modal mobility options to improve the convenience of making trips without the use of a personal automobile. The Project includes pedestrian enhancements surrounding the Project Site that would provide better connections to transit stops. The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. The Project would expand residential and employment opportunities in proximity of residential and commercial areas, destinations, and other neighborhood services in a diverse urban area. Finally, the Project is estimated to generate lower VMT per capita than the average for the area. VMT directly contributes to GHG emissions; as such, a reduced VMT per capita also reduces GHG per capita. The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Thus, based on the above and as detailed in Table 7 of the Transportation Assessment included as Appendix K.1 of this SCEA, the Project is consistent with the policies included in the Plan for a Healthy Los Angeles.

### Westchester–Playa Del Rey Community Plan

The Community Plan identifies one transportation-related objective that specifically addresses the reduction of vehicular trips (Objective 1-2), and several objectives and policies that address various site and building design guidelines to be considered for multi-family developments. As previously discussed, the Project incorporates pedestrian and bicycle enhancements that would improve mobility for pedestrians and promote the use of alternative transportation modes. In addition, the Project would implement TDM strategies to further reduce the number of single-occupancy vehicle trips generated by

the Project. Additionally, to better facilitate Project-related traffic to and from the Project Site, no new access points on Manchester Avenue, Truxton Avenue, and La Tijera Boulevard are proposed. Further, with the removal of existing driveways on Manchester Avenue, the Project would be designed to minimize vehicle/pedestrian conflicts. Thus, based on the above and as outlined in Table 8 of the Transportation Assessment included as Appendix K.1 of this SCEA, the Project would not conflict with applicable policies of the Community Plan addressing the circulation system.

### Los Angeles Coastal Transportation Corridor Specific Plan

The City adopted the Coastal Transportation Corridor Specific Plan to establish a transportation mitigation program for all lots located in whole or in part within the Specific Plan Area. The regulations of the Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter I of the LAMC, as amended, and any other relevant ordinances, and do not convey any rights not otherwise granted under the provisions and procedures contained in the LAMC and other relevant ordinances except as specifically provided herein. Provisions within the Specific Plan supersede the applicable regulations of the LAMC unless overridden by the LAMC or other adopted ordinance.[201] The Specific Plan is intended to adopt a transportation impact mitigation program in the Specific Plan area to achieve the purposes of the Specific Plan.

The Project would not conflict with the applicable purposes of the Specific Plan. In particular, the Project would support the purpose to encourage walking and bicycling as a means to safely and conveniently access transit and circulate within the neighborhood as the Project would provide parking in accordance with LAMC requirements. In addition, the Project would include the development of housing, including affordable housing, within proximity to jobs provided on the Project Site and within the Project Site vicinity. The Project would also comply with the transportation mitigation standards and procedures set forth in Section 5 of the Specific Plan. In particular, in consultation with LADOT, the Transportation Assessment has considered the trip generation rates provided in Appendix A of the Specific Plan. The Project's Transportation Assessment, included in Appendix K.1 of this SCEA, has been reviewed by LADOT and a copy of LADOT's Assessment Letter of the Transportation Assessment is included in Appendix K.2 of this SCEA. Furthermore, the Project would comply with the improvement, dedication, transportation measures, TDM and phasing requirements outlined in Sections 9 and 10 of the Specific Plan.

Regarding the TIA Fee established by the Specific Plan, the Specific Plan requires that this fee be paid by project applicants pursuant to the terms of the Specific Plan. These Specific Plan terms include, but are not limited to: (1) Section 5.A. of the Specific Plan which requires that project applicants pay this fee prior to the issuance of the first permit for the Project by LADBS (or per Section 7.C, if the Project qualifies as a residential project, the fee may be paid at the time of issuance of the first certificate of occupancy); and (2) Section 7.B of the Specific Plan which requires that the fee amount for a project shall be determined by LADOT. The Project Applicant will pay the required TIA fee for the Project in accordance with the requirements of the Specific Plan.

[201] *City of Los Angeles, Coastal Transportation Corridor Specific Plan, effective September 22, 1993, amended June 28, 2019.*

### LAMC

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. As discussed in Section 3, Project Description, of this SCEA, consistent with the requirements set forth in the LAMC, the Project would provide 234 bicycle parking spaces (including 206 long-term spaces and 28 short-term spaces); therefore, the Project would be consistent with LAMC Section 12.21.A.16.

LAMC Section 12.26J, the TDM Ordinance (Ordinance No. 168,700, effective March 31, 1993) establishes trip reduction requirements for non-residential projects, in addition to non-residential components of mixed-use projects in excess of 25,000 square feet. While not subject to the TDM Ordinance, the Project would incorporate TDM measures to encourage use of alternative transportation modes by providing on-site bicycle parking facilities, providing connection to off-site pedestrian facilities, and concentrating development in proximity to transit opportunities, consistent with the requirements set forth in the TDM Ordinance. Thus, the Project would not conflict with the LAMC.

### Vision Zero Action Plan/Vision Zero Corridor Plan

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

As discussed in the Transportation Assessment, included as Appendix K.1 of this SCEA, the Project is not located along any street segments identified as part of the HIN. Additionally, no active Vision Zero Safety Improvements projects are planned adjacent to or within the Project Site vicinity. Furthermore, the Project improvements to the pedestrian environment would not preclude future Vision Zero Safety Improvements by the City. Thus, the Project would not conflict with Vision Zero.

### Downtown Westchester Community Design Overlay District

The Downtown Westchester CDO District covers properties primarily fronting Sepulveda Boulevard and Manchester Avenue and also including frontage on Sepulveda Westway, Sepulveda Eastway, La Tijera Boulevard, and 87th Street. The intent of the CDO is to provide design guidance and direction to enhance the visual identity, commercial viability, safety, walkability, and enjoyment of Downtown Westchester. The Downtown Westchester CDO District includes the following transportation and circulation guidelines that are applicable to the Project:

- Guideline 1: Encourage an inviting pedestrian environment and provide for streetwall continuity by locating buildings so they front the main commercial street, and encourage active public uses, such as additional street trees, outdoor seating, kiosks, forecourts and arcades.

- Guideline 2: Improve streetwall continuity and encourage a safe and inviting pedestrian environment by locating parking away from the streetwall and minimizing direct driveway access from major streets. Design parking facilities that do not depreciate the visual quality of the downtown.

The Project would create an inviting pedestrian environment through its design via the inclusion of pedestrian amenities and would include accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. The Project would include a 2,345-square-foot plaza on the southern end of the Project Site, which would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and extensive landscaping. The Project would also provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. Access points would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project would also comply with ADA requirements. Furthermore, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Therefore, the Project would not conflict with the applicable guidelines of the Downtown Westchester CDO District.

**Citywide Design Guidelines**

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

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

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

The Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities and would include accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. Specifically, on the ground level, the Project would include a 2,345-square-foot plaza on the southern end of the Project Site to complement the commercial uses at the ground level and integrate the Project with the surrounding community. The plaza would feature a battered wall raised planter, turf lawn, banquette seating, picnic tables, sculptures, and extensive landscaping. The Project would also provide new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, as appropriate. Thus, based on the above and as

outlined in Table 9 of the Transportation Assessment, included as Appendix K.1 of this SCEA, the Project is consistent with the applicable policies of the Design Guidelines.

### 2020–2045 RTP/SCS

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in an urbanized area and designated PGAs, including an HQTA, NMA, and Livable Corridor, that is well served by public transit. The Project would include various streetscape improvements and ground level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would provide bicycle parking per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

### 2024–2050 RTP/SCS

The goals of the 2024–2050 RTP/SCS fall into four core categories: mobility, communities, environment, and economy. Specific to the core category of mobility, the 2024–2050 RTP/SCS includes the following categories of mobility policies and strategies: System Preservation and Resilience, Complete Streets, Transit and Multimodal Integration, Transportation System Management, Transportation Demand Management, Technology Integration, Safety, and Funding the System/User Fees. As previously discussed, the Project would improve mobility and accessibility, encourage transit use, and reduce VMT and GHG emissions by intensifying urban density in proximity to transit and destinations; providing complementary new uses (i.e., multi-family residential and commercial uses) in proximity to other existing residential, office, retail, restaurant, and hotel uses; providing pedestrian and bicycle improvements; and implementing TDM strategies to reduce single-occupant travel. The Project would also support healthy and equitable communities by encouraging walking and bicycling, providing EV charging stations, facilitating a reduction of VMT and air pollution, and providing public realm improvements (i.e., improved sidewalks, new street trees, and landscaping).

Furthermore, because the Project would be located within a Transit Priority Area and in an area well-served by various transit lines, the Project would contribute to the productivity and use of the regional transportation system. The Project would provide housing, employment, and local-serving uses near transit and encourage active transportation by providing new bicycle parking infrastructure and active street frontages, in line with the 2024–2050 RTP/SCS goals. Thus, the Project would encourage a variety of transportation options and would be consistent with the 2024–2050 RTP/SCS goal of maximizing mobility and accessibility in the region while at the same time reducing VMT and GHG emissions.

### Cumulative Impacts

**Less Than Significant Impact.** The cumulative analysis takes into consideration the seven related projects within 1 mile of the Project Site (listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA). Similar to the Project, the related projects would be individually responsible for complying with relevant plans, programs, ordinances, and policies addressing the circulation system. Thus, overall, implementation of the Project, together with the related projects, would not create inconsistencies with the Mobility Plan, Plan for a Healthy Los Angeles, Westchester–Playa Del Rey

Community Plan, Los Angeles Coastal Transportation Corridor Specific Plan, LAMC, Vision Zero, the Downtown Westchester CDO District, and the Citywide Design Guidelines. Thus, the Project and the related projects would not result in a cumulative impact that would preclude the City from serving the transportation needs as defined in its adopted programs, plans, ordinances, or policies. 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 verification regarding their consistency with applicable policies. ***Therefore, the Project, together with the related projects would not create inconsistencies with respect to the identified programs, plans, policies, and ordinances addressing the circulation system and cumulative impacts would be less than significant.***

**b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less Than Significant.** SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019, updated July 2020), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in Los Angeles. The Project Site is located within the West Los Angeles APC, for which the following thresholds have been established:

- Household VMT per Capita: 7.4
- Work VMT per Employee: 11.1

Per the VMT Calculator User Guide (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet), and is thus, considered to be less than significant. As such, the Project's 16,120 square feet of ground-floor commercial space would not result in a significant work VMT impact.[202]

Based on the Project's land uses and location, the Project is estimated to generate 7,935 daily household VMT, resulting in a daily household VMT per capita of 6.8. The average household VMT per

[202] *It is noted that the analysis provided herein assumes 10,750 square feet of restaurant space and 5,370 square feet of retail space. As discussed in Section 3, Project Description, of this SCEA, the Project would include 10,747 square feet of restaurant space and 5,373 square feet of retail space. Numbers differ due to rounding.*

capita would not exceed the West Los Angeles APC significance household impact threshold of 7.4. Therefore, the Project would not result in a significant VMT impact. ***Accordingly, 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:** Pursuant to City's requirements, prior to the start of construction, a Construction Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan will include, but not be limited to, the following measures, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

**Cumulative Impacts**

**Less Than Significant.** Cumulative effects of development projects are determined based on the consistency with the air quality and GHG reduction goals of the RTP/SCS in terms of development location, density, and intensity. As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT

per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS. As described above, the Project would not result in a significant VMT impact. Therefore, the Project is not anticipated to result in a cumulative VMT impact. Furthermore, the Project would also contribute to the productivity and use of the regional transportation system by providing employment and housing near transit and encouraging active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the Project is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.***

**c. Would the project 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.** Pursuant to the TAG (Threshold T-3) the determination of significance regarding hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

Vehicular access to the Project Site is currently provided via an existing access point along Truxton Avenue, and a consolidated access point on La Tijera Boulevard. The access point on La Tijera Boulevard would require new curb cuts and would accommodate ingress and egress maneuvers. As previously discussed, the final design of the access points would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during site plan review to ensure code compliance and safe pedestrian and vehicular design. The Truxton Avenue driveway would accommodate ingress and egress maneuvers and would not cross any existing or planned bicycle facilities. The driveway would only provide residential access to the Project parking garage. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. In addition, the two existing on-street loading spaces currently provided along the Truxton Avenue frontage would be removed to provide adequate visibility. The section of La Tijera Boulevard along which the Project's driveway is located is constructed with four existing travel lanes, two in each direction, divided by a two-way left-turn lane. The driveway on La Tijera Boulevard would accommodate all ingress and egress maneuvers and would not cross any existing or planned bicycle facilities. No exceptional horizontal or vertical curvatures exist along this section of roadway that would create sight distance issues for Project traffic utilizing the proposed driveway. No unusual or new obstacles are presented in the Project design that would be considered hazardous to motorized vehicles, non-motorized vehicles, or pedestrians.

Pedestrian and bicycle volumes are expected to increase to and from the Project Site. Nonetheless, the Project is designed to encourage and accommodate the increases in pedestrian and bicycle activity to and from the Project Site, though not in sufficient quantities to result in a significant conflict with the vehicles using the access points. The removal of the two existing access points on Manchester Avenue

would further improve bicycle and pedestrian safety to and from the Project Site by reducing the potential for vehicle and pedestrian/bicycle conflicts.

Currently, the sidewalks along the Project frontages provide a continuous pedestrian connection to the Project Site. Adjacent to the Project Site, generally 12-foot-wide sidewalks are provided along La Tijera Boulevard and Truxton Avenue, while eight-foot wide sidewalks are provided along Manchester Avenue. None of the Project access points would cross any existing bicycle facilities.

As previously detailed, adjacent to the Project Site, La Tijera Boulevard is identified as part of the PED. The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping and sidewalk improvements as well as dedications along Manchester Avenue and La Tijera Boulevard. Further, pedestrian and bicycle access to the Project Site would be separated from vehicular traffic. The Project improvements would not preclude or interfere with the implementation of any other future roadway improvements benefiting pedestrians or bicycles. The Project driveways would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or vehicular-pedestrian conflicts. Based on the above, the Project does not present geometric design hazards related to mobility or pedestrian accessibility.

### Freeway Safety

In May 2020, LADOT issued the City Freeway Guidance for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

The City Freeway Guidance requires analysis of freeway off-ramps where a proposed development project adds 25 or more trips in either the morning or afternoon peak hour to be studied for potential queueing impacts. If the proposed project is not projected to add 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. As identified in the Transportation Assessment, based on the Project's trip generation estimates and trip assignments, the Project would add 29 trips to the I-405 Southbound Off-Ramp to La Tijera Boulevard during the afternoon peak hour. Therefore, further freeway off-ramp analysis is required.

The 95th percentile ramp queue was calculated using the *Highway Capacity Manual, 6th Edition* (Transportation Research Board, 2016) (HCM) methodology, which was implemented using Synchro software and signal timing worksheets from the City for the signalized location. The 95th percentile ramp queue measures the probability that a queue length will reach a certain length and is the maximum vehicular queue that would not be exceeded 95 percent of the time. Synchro queue results that are reported in vehicle-length were converted to linear feet by multiplying each vehicle by 25 feet to account for the average length of a vehicle plus distance between vehicles in the queue. Conditions were analyzed for the anticipated Project buildout year of 2029, with and without Project trips.

As concluded in the Transportation Assessment, the queue would not exceed the ramp storage capacity and Project-related vehicles would not add 50 feet or more to the queue. Therefore, the Project would not be subject to speed differential analyses, nor is the Project anticipated to cause an adverse safety condition. Thus, no corrective measures are required. Nonetheless, as previously detailed, the Project

would implement comprehensive TDM strategies to reduce single-occupancy vehicle trips and encourage the use of alternative transportation modes to and from the Project Site.

**Based on the above, the Project would not substantially increase hazards at Caltrans facilities, and impacts would be less than significant.**

**Cumulative Impacts**

**Less Than Significant Impact.** Of the seven related projects within 1 mile of the Project Site, none of the related projects are located within the same block as the Project. ***Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Thus, Cumulative impacts would be less than significant.***

**d. Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities, such as traffic control and flagging, 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 standard management plans required by LADOT that would be implemented to ensure adequate circulation and emergency access along the Project Site would be maintained, as discussed in Project Design Feature TR-PDF-1. With regard to operation, the Project would generate traffic in the Project vicinity and would result in limited modifications to Project Site access, primarily associated with access points. The Project would not include the installation of barriers along any surrounding streets such that emergency access would be modified or impeded. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable. ***Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the study area and would not be concentrated to a specific location. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected.

***Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.***

# XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☐ | ☒ | ☐ |
| 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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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*

As discussed below, the Project would implement specific mitigation measures tailored for the Project's location and development characteristics, which would be equal to or more effective than Mitigation Measure PMM TCR-1 from the 2020–2045 RTP/SCS PEIR, would ensure that the Project's impacts regarding tribal cultural resources would be less than significant. As such, Mitigation Measure PMM TCR-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated as part of the Project.

**SCAG 2024–2050 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 CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources. Such measures may include the following or other comparable measures identified by the lead agency:

a) Avoid and/or preserve 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) Treat 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) Provide 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.

d) If tribal cultural resources are found, then the lead agency should consider tribal construction monitoring.

### *Applicability to the Project*

As discussed below, the Project would implement specific mitigation measures tailored for the Project's location and development characteristics, which would be equal to or more effective than Mitigation Measure PMM TCR-1 from the 2024–2050 RTP/SCS PEIR, would ensure that the Project's impacts regarding tribal cultural resources would be less than significant. As such, Mitigation Measure PMM TCR-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated as part of the Project.

**Impact Analysis**

*The following analysis is primarily based on the Tribal Cultural Resources Assessment for the Manchester Mixed-Use Development Project (Tribal Cultural Resources Report) that was prepared for the Project by SWCA Environmental Consultants on November 22, 2022, which is included as Appendix L of this SCEA.*

**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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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.** As previously discussed, a Tribal Cultural Resources Report was prepared for the Project Site and is included as Appendix L of this SCEA. The Tribal Cultural Resources Report includes the results of a confidential record search of the CHRIS, a Sacred Land File (SLF) search, and archival research and a review of ethnographic literature conducted by SWCA.

As outlined in the Tribal Cultural Resources Report, a CHRIS records search was conducted through the SCCIC located at the California State University, Fullerton. As shown in Table 2 of the Tribal Cultural Resources Report, a total of 17 previously conducted cultural resource studies and one archaeological site have been identified within a 0.5-mile radius of the Project Site. Of the 17 previously conducted cultural resources studies, one of the study areas overlapped the Project Site; however, the study does not provide detailed information specific to the Site.

One archaeological site (CA-LAN-214, hereafter LAN-214) was mapped outside the Project Site; however, the location and contents are uncertain because they were based on the report of a local resident. The description given in the site record would place LAN-214 somewhere within the Project Site.

As concluded in the Tribal Cultural Resources Report, included as Appendix L of this SCEA, there are no indications that the Project Site was part of a more substantial or intensively occupied Native American settlement that might have produced deeply buried deposits. Nonetheless, the sediments in the Project Site and those of the surrounding areas to the north and south are capable of preserving deeply buried artifacts. Also, it is possible for artifacts and Native American objects to be recovered from a surface stratum that has been subjected to alterations from development—typically referred to as artificial fill. Thus, the effects of development within the Project Site do not fully eliminate the potential for deposits, but they are considered to have a net decrease in the potential sensitivity.

In addition, a SLF search was conducted through the Native American Heritage Commission (NAHC). The NAHC is charged with identifying, cataloging, and protecting Native American cultural resources, which includes ancient places of special religious or social significance to Native Americans, and known ancient graves and cemeteries of Native Americans on private and public lands in California. The NAHC's inventory of these resources is known as the SLF. In addition, the NAHC maintains a list of tribal contacts affiliated with various geographic regions of California. 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. SWCA submitted an SLF search request for the Project Site to the NAHC on July 10, 2022. Results were received by letter on September 15, 2022, indicating negative results.

Archival research and a review of ethnographic literature were conducted to assess the likelihood for any potentially buried tribal cultural resources to be preserved on the Project Site. According to this research, as outlined in the Tribal Cultural Resources Report in Appendix L of this SCEA, the Project Site was first used for agricultural purposes by the middle of the nineteenth century. In 1868, the Project Site was sold and used for sheep and cattle raising. Around the turn of the twentieth century, the land surrounding the Project Site still retained a pastoral character with very few permanent residents. Historical topographic maps and aerial photographs show that the Project Site was undeveloped at the beginning of the twentieth century. In 1924, the Project Site is depicted as being south of Defiance Street, which is present-day Manchester Avenue and east of a two-track road segment. A structure is plotted just south of the Project Site. By 1927, the Project Site is shown as being in the northwest portion of a plot of land lined on all four sides with landscaping trees. At least one residence and several outbuildings are shown just south of this portion of the parcel and a smaller structure is depicted east of the Project Site. The vicinity of the Project Site is predominantly agricultural, with residential plots dotting the area. By 1934, present-day La Tierra Boulevard is shown as crossing the southwestern portion of the Project Site. No structures are present within the Project Site but the areas to the north and east are shown to be urbanized. By 1950, the entire area around the Project Site is depicted as urbanized. The building housing the existing Pep Boy Auto Shop is shown in the northwest corner of the Project Site, with a parking lot encompassing the remainder of the Project Site. By 1968, the building that houses present-day Del Taco is depicted in the southern corner of the Project Site.

A review of ethnographic literature and other archival sources indicate that several named Native American sites and suspected settlements are identified by historical maps and ethnographic accounts within an 8.5-mile radius to the northwest of the Project Site (see Figure A-5 of the Tribal Cultural Resources Report). The named sites include Waachnga, located approximately 2 miles northwest of the Project Site; Kuruvunga, located approximately 7 miles northwest of the Project Site; and Comicrabit, located approximately 8.5 miles northwest of the Project Site. The La Brea Tar Pits, located 7.5 miles northeast of the Project Site, were known to have provided valuable resources to Native American groups. The closest named Native American village to the Project Site is known as Waachnga. Waachnga (alternately spelled or referred to as Guaspet, Guasna, Guashna, Guachpet, Guashpet), which has been identified through historical and ethnographic sources, was likely located within the Ballona Wetlands, northwest of the Project Site. All accounts of Waachnga point to an area either on the bluffs to the south of Ballona Creek or in the lowlands near the creek, approximately 2 miles to the northwest of the Project Site (see Figure A-5 of the Tribal Cultural Resources Report).

While the Native American sites identified in the vicinity all likely contain additional material components (i.e., potential tribal cultural resources, beneath the existing grade and outside of their mapped boundaries) these locations are considered to be too far away to suggest an increased sensitivity directly within the Project Site. Native Americans who occupied these settlements and foraged for resources in the area would have accessed the different locations using footpaths. Foraging and other types of activities, including interring human remains, would have occurred intermittently along these routes, some of which would have produced archaeological deposits. Such deposits, typically described as open camps, tend to be characterized by less substantial deposits than what might be expected at a more permanently inhabited settlement or intensively used area. At least some of the primary thoroughfares within the contemporary street grid were likely established along some of these trails. However, within the urbanized setting that characterizes the Project Site and its surroundings, there is little to no direct evidence identified that would allow for a reliable reconstruction of any such trails in a spatially explicit way.

As previously discussed, although there are no indications that the Project Site was part of a more substantial or intensively occupied Native American settlement that might have produced deeply buried deposits, the sediments in the Project Site and those of the surrounding areas to the north and south are capable of preserving deeply buried artifacts. Also, it is possible for artifacts and Native American objects to be recovered from a surface stratum that has been subjected to alterations from development—typically referred to as artificial fill. Thus, the sensitivity for tribal cultural resources at the Project Site is moderate. Therefore, in consideration of the known sensitivity of the surrounding area for tribal cultural resources, it is recommended in the Tribal Cultural Resources Report that a tribal consultant and qualified archaeologist be retained during ground disturbing activities (Mitigation Measure TCR-MM-1). Additionally, prior to the commencement of ground-disturbing repair activities, the qualified archaeologist and tribal consultant or their designees will provide a briefing to construction crews to provide information on regulatory requirements for the protection of archaeological resources and tribal cultural resources (Mitigation Measure TCR-MM-2). Furthermore, in the event of inadvertent discovery of tribal cultural resources, the protocols outlined in Mitigation Measure TCR-MM-3, below, would be followed.

In summary, 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, and potential impacts to tribal cultural resources would be less than significant.

**Mitigation Measures**

**I**n consideration of the known sensitivity of the surrounding area for tribal cultural resources, the following mitigation measures are provided to reduce Project impacts related to tribal cultural resources:

**Mitigation Measure TCR-MM-1:** Prior to any ground disturbing activities on the project site associated with the Proposed Project, the project proponent shall retain a tribal consultant and qualified archaeologist. Ground disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the Project site. A qualified archaeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology and the Society for California Archaeology's qualifications for a principal investigator. A tribal consultant is defined as one who is on the NAHC's Tribal Contact list. The qualified archaeologist and tribal consultant shall submit a letter of retention demonstrating the qualifications to the Project proponent and City of Los Angeles, Department of City Planning (City Planning) no fewer than 15 days before ground-disturbing activities commence.

**Mitigation Measure TCR-MM-2:** Prior to the commencement of ground-disturbing repair activities, at the project kickoff, the qualified archaeologist and tribal consultant or their designees will provide a briefing to construction crews to provide information on regulatory requirements for the protection of tribal cultural resources. As part of this training, construction crews will be briefed on proper procedures to follow should unanticipated discoveries of tribal cultural resources be made during construction. Workers will be provided contact information and protocols to follow if inadvertent discoveries are made in the event these discoveries are made. Additionally, workers will be shown examples of the types of resources that would require notification. The training will include a summary

of the applicable regulations and penalties for non-compliance. A copy of the training materials and a list of attendees will be provided to City Planning no more than 10 days after completing the training.

**Mitigation Measure TCR-MM-3:** Should potential tribal cultural resources be encountered by construction crews during ground-disturbing activities, such activities in the vicinity of the potential resource shall be temporarily halted and the archaeologist and tribal consultant retained for the proposed Project shall be notified. If the archaeologist and/or tribal consultant determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City shall be notified and provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The project proponent would then implement the tribe's recommendations if the Project's archaeologist reasonably concludes that the tribe's recommendations are reasonable, feasible, and based on substantial evidence. The recommendations would then be incorporated into a tribal cultural resources treatment and monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. During the assessment of such encountered potential tribal cultural resources, ground disturbance activities may be recommenced outside of a specified radius of the discovery site, so long as this radius has been reviewed and determined to be reasonable and appropriate by the Project's archaeologist and tribal consultant.

***In summary, with implementation of TCR-MM-1 through TCR-MM-3, the Project's potential impacts to tribal cultural resources would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** As listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA, there are seven related projects within 1 mile of the Project Site. None of the related projects are located within the same block as the Project. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, related projects, and other future development within the Community Plan area affected the same tribal cultural resources and communities. All Project development would occur within the boundaries of the Project Site, and, as discussed above, there are no tribal cultural resources identified on the Project Site. However, in the event that tribal cultural resources are uncovered, the Project and each related project would be required to comply with the applicable regulatory requirements discussed above. In addition, related projects would be required to comply with the City's standard Condition of Approval regarding inadvertent discovery of tribal cultural resources and the consultation requirements of AB 52, as applicable, to determine and mitigate any potential impacts to tribal cultural resources. **Therefore, cumulative impacts related to tribal cultural resources would be less than significant and would not be cumulatively considerable.**

# 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? | ☐ | ☐ | ☒ | ☐ |
| 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 Mitigation Measure PMM USSW-2 from the 2020–2045 RTP/SCS PEIR, the Project would comply with existing regulatory requirements that are already incorporated in the Project, including adherence to applicable regulations of Title 24 of the California Building Code 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 necessary. 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 Mitigation Measure PMM USSW-2 from the 2020–2045 RTP/SCS PEIR, this measure would not be incorporated into 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, Mitigation Measure PMM-USWW-1 from the 2020–2045 RTP/SCS PEIR would not be incorporated into 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 onsite to tertiary standards and use it for non-potable uses onsite.

***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 and would also implement Project Design Feature WAT-PDF-1, which includes measures that are consistent with Mitigation Measure PMM USWS-1 from the 2020–2045 RTP/SCS PEIR. As the applicable regulatory requirements and Project Design Features are equal to or more effective that Mitigation Measure PMM USWS-1 from the 2020–2045 RTP/SCS PEIR, it is not incorporated into the Project.

**SCAG 2024–2050 RTP/SCS PEIR Mitigation Measures**

**PMM UTIL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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. The proposed development can and should 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, Mitigation Measure PMM-UTIL-1 from the 2024–2050 RTP/SCS PEIR would not be incorporated into the Project.

**PMM UTIL-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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 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 how these can be obtained. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.

c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.

d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

***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 and would also implement Project Design Feature WAT-PDF-1, which includes measures that are consistent with Mitigation Measure PMM UTIL-2 from the 2024–2050 RTP/SCS PEIR. As the applicable regulatory requirements and Project Design Features are equal to or more effective that Mitigation Measure PMM UTIL-2 from the 2024–2050 RTP/SCS PEIR, it is not incorporated into the Project.

**PMM UTIL-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the 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 consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following:

a) Reuse and minimize construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.

b) Include 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 existing structure and shell in renovation projects.

e) Develop 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 where appropriate and feasible.

h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent state 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 additional 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 Mitigation Measure PMM UTIL-3 from the 2024–2050 RTP/SCS PEIR, the Project would comply with existing regulatory requirements that are already incorporated in the Project, including adherence to applicable regulations of Title 24 of the California Building Code 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 necessary. 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 Mitigation Measure PMM UTIL-3 from the 2024–2050 RTP/SCS PEIR, this measure would not be incorporated into the Project.

**Impact Analysis**

*The following analysis is primarily based on the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) that was prepared for the Project by KPFF Consulting Engineers dated October 2024, which is included as Appendix M 2 of this SCEA.*

**a. Would the project 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.**

**Water**

**Construction**

As discussed in the Utility Report included as Appendix M.2 of this SCEA, Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, excavation/export, removal and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction ranges from 500 to 1,000 gallons per day (gpd). The estimated construction-period water demand will be less than the existing water consumption at the Project Site, and less than the estimated operational demand of the Project, which, as discussed below, can be accommodated by existing infrastructure. Thus, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. As such, water needs during construction of the Project would not result in the construction of new or expanded water distribution facilities, and the existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction. Impacts on water infrastructure due to construction activity would therefore be less than significant.

The Project would also require construction of new, on-site water distribution lines to serve the new buildings and facilities. Such improvements/activities 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 connection to the public main, if required. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. While trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1, as discussed under Item XVII, Transportation, of this SCEA. This Construction Management Plan, which would be reviewed and approved by LADOT, would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties is maintained during the construction period. Overall, Project construction activities would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project construction-related water infrastructure impacts would be less than significant.

### Operation

LADWP maintains water infrastructure to the Project Site. As noted in the Utility Report, included as Appendix M.2 of this SCEA, there is one 6-inch water main in Truxton Avenue and one 8-inch water main in Manchester Avenue. In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Utility Report, there are three existing fire hydrants: two hydrants are located along Truxton Avenue and one hydrant is located along Manchester Avenue.

When analyzing the capacity of the water infrastructure system to serve a project, the estimated operational demands of the project for both fire suppression and domestic water are considered. Although domestic water demand would be the Project's main contributor to water demand in the long term, the Project's fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. These analyses are described in detail in the Utility Report included as Appendix M.2 of this SCEA.[203]

With regard to fire flow, based on fire flow standards set forth in LAMC Section 57.507.3, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 psi. Based on the completed IFFAR (included as Exhibit 3A of Appendix M.2 of this SCEA), five existing nearby hydrants flowing simultaneously can provide 7,100 gpm. Therefore, based on the IFFAR, there is adequate fire flow and available to for the Project to comply with the requirements pursuant to LAMC Section 57.507.3.

In addition, the Project would incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands. Per LAMC Section 94.2020.0, which adopts by reference the NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. The information from the SAR that was submitted to LADWP, which is included as Exhibit 2 of the Utility Report, indicates that domestic and fire water service off Truxton Avenue has a static pressure of 67 psi and a flow of up to 1,400 gpm that can be delivered with a residual pressure of 41 psi. This confirms there is sufficient pressure to serve the Project.

Overall, based on the IFFAR and SAR, there is adequate fire flow available for the Project to comply with the requirements identified for the Project in accordance with LAMC Section 57.507.3 and LAMC Section 94.2020.0. Thus, fire flow impacts to LADWP's water infrastructure capacity would be less than significant.

Domestic water demand has been estimated based on LASAN sewage generation factors for applicable land use categories. The Project water consumption estimates are based on 100 percent of the LASAN sewage generation factors for the Project's various uses. As shown in Table 28 and discussed further below, the Project would generate a net increase in water demand of 59,480 gpd. As demonstrated in

[203] *KPFF Consulting Engineers, 6136 W. Manchester, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, October 2024.*

the WSA for the Project, included as Appendix M.1 of this SCEA, the existing public water distribution infrastructure has sufficient capacity to serve the Project.

***Based on the above, the Project would not exceed the available capacity of existing water facilities, including the distribution infrastructure, that would serve the Project Site. Accordingly, the Project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, the Project's operational impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the seven related projects within 1 mile of the Project Site (listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA) would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. In addition, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), with the current (2018–2019) WIP containing a five-year water system capital improvement plan that includes $6.3 billion for needed water system infrastructure improvements and maintenance.[204] Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects. Additionally, as with the Project, the related projects would be required to implement a Construction Management Plan to ensure that adequate and safe access remains available within and near the related project sites during construction activities. ***Therefore, cumulative water infrastructure impacts would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

**Wastewater**

**Construction**

Construction activities for the Project could result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal and would be offset by the existing uses to be removed. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas provided by the construction contractor, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

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[204] *LADWP, 2018–2019 Water Infrastructure Plan.*

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing wastewater infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for utility lines and connections to the public infrastructure and would be limited to the on-site wastewater distribution, and minor off-site work associated with connections to the public main (no upgrades to the public main are anticipated, as discussed below). Project contractors would coordinate with the City to identify the locations and depth of all lines prior to ground disturbance. Furthermore, the City would be notified in advance of proposed ground disturbance activities in order to avoid disruption of service. In addition, as set forth in Project Design Feature TR-PDF-1 included under Item XVII, Transportation, of this SCEA, a Construction Management Plan would be implemented during Project construction to ensure that adequate and safe pedestrian and vehicle access remains available within and near the Project Site during construction activities. The Construction Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Overall, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with construction of the Project would be less than significant.

### Operation

LASAN operates and maintains the wastewater treatment, reclamation, and collection facilities serving most of the City of Los Angeles incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the Hyperion Treatment Plan (HTP) System. As outlined in the Utility Report prepared for the Project and included as Appendix M.2 of this SCEA, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at the HTP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant) and the existing average daily flow for the system is approximately 300 mgd.

Wastewater infrastructure serving the Project Site includes an 8-inch vitrified clay pipe (VCP) sewer line from the intersection of Truxton Avenue and the first alley south of Manchester Avenue that flows westward as well as an 8-inch VCP sewer line in the first alley northwest of La Tijera Boulevard that flows to the southwest.

As shown in Table 22 on page 292, based on sewage generation factors established by City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), the Project would generate a net increase of approximately 824,567 gpd of wastewater, or approximately 0.82 million gallons per day (mgd). The Project's average daily wastewater flow of 0.82 mgd would represent substantially less than 1 percent of the available capacity of the Hyperion Service Area.

A Sewer Capacity Availability Report (SCAR) response, included as Exhibit 4B of the Utility Report included as Appendix M.2 of this SCEA, was obtained from LASAN to evaluate the capability of the existing local wastewater system to serve the Project's estimated wastewater flow.

The approved SCAR indicates that sufficient wastewater capacity wastewater to serve the Project's anticipated discharge. Specifically, the Project is approved to discharge a maximum of 829,819 gpd of sewage (576.26 gpm) of sewage to the local sewer mains, which exceeds the Project's net wastewater discharge of 824,567 gpd. Additional sewer capacity analysis has also been performed by KPFF to determine if the existing infrastructure could accommodate the additional wastewater generated by the Project. Based on the City of Los Angeles Sewer Design Manual Part F, the trigger flow in a sanitary sewer is the quantity of flow that, once reached, would initiate the planning for a relief or replacement of the sewer. Currently, this trigger flow is considered when the depth of flow reaches three-fourths of the pipe diameter, or a d/D of 75 percent. As outlined in Table 5 of the Utility Report included as Appendix M.2 of this SCEA, the Project's additional sewer flow is not anticipated to exceed the trigger flow in any of the sewer lines identified in the SCAR. During the Project's permitting process, further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. As such, operations-related wastewater infrastructure impacts would be less than significant.

**Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the related projects and other nearby development projects that would potentially utilize the same infrastructure as the Project. Under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), LASAN assesses the anticipated wastewater flows from development projects at the time of connection and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. New development projects in the vicinity of the Project Site would be required to submit a Sewer Capacity Availability Request (SCAR) or a SAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines to determine if there is adequate sewer capacity. In addition, new development projects would also be subject to LAMC Section 64.11 and Section 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with LASAN and comply with all applicable City and State water conservation programs and sewer allocation ordinances. ***Therefore, the cumulative impact related to the construction or expansion of wastewater infrastructure would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.***

### Stormwater

#### Construction

As discussed under Item XIV, Hydrology and Water Quality, the Project would implement BMPs designed to contain stormwater or construction watering on the Project site such that runoff does not impact off-site drainage facilities or receiving waters. Therefore, there would be no incremental increase in runoff volumes during construction of the Project. Additionally, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, Project construction would not create runoff that would exceed the capacity of existing or planned drainage systems and no new or relocated stormwater facilities would be required during construction. Accordingly, impacts would be less than significant.

#### Operation

With regard to stormwater drainage, as discussed above under Item X, Hydrology and Water Quality, at buildout of the Project, the Project Site would be comprised of approximately 100-percent impervious areas. In addition, BMPs would be implemented to control runoff. As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. Accordingly, impacts would be less than significant.

***As such, based on the above, construction and operation of the Project would not create runoff that would exceed the capacity of existing or planned drainage systems, and impacts would be less than significant.***

### Cumulative Impacts

**Less Than Significant Impact.** Stormwater from each of the seven related projects and other nearby development projects would be collected on each of the respective sites, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first 0.75 inch of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. ***Therefore, the cumulative impact related to the construction or expansion of stormwater infrastructure would be less than significant and the Project's contribution to cumulative stormwater impacts would not be cumulatively considerable.***

### Electrical Power

#### Construction

The existing power service in the vicinity of the Project Site is supplied by LADWP. Construction activities on the Project Site would require electrical power to convey water for dust control and for lighting, power tools and equipment, and construction trailers. Overall, demolition and construction

activities would require minimal electrical consumption. As described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for the Project, and since the demand for electricity during construction would be minimal, there is also enough capacity to provide service for construction activities. The demand would be supplied from existing electrical services within the Project Site and would not affect other services. Thus, construction activities would not be expected to have any adverse impact on available electricity supplies.

The Project would require construction of new electrical mains to serve the new buildings and facilities. Construction impacts associated with electrical infrastructure upgrades would primarily be confined to trenching. Installation of electrical infrastructure would be limited to on-site electrical distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Infrastructure improvements would comply with all applicable requirements and regulations set forth by LADWP, which would ensure that service disruptions and potential impacts are minimized. In addition, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see Project Design Feature TR-PDF-1 under Item XVII, Transportation, of this SCEA). Therefore, construction of the Project would not result in significant impacts related to electrical power.

### Operation

Operation of the Project would require electricity for the residential and commercial uses on site. As shown on Table 13 on page 156, the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 4,111,183 kWH per year, which is less than 0.02 percent of LADWP's projected sales in 2029-2030 fiscal year.[205] As discussed in the Utility Report, LADWP has confirmed that the there is sufficient capacity to serve the Project's electricity demand. The will-serve letter from LADWP is included as Exhibit 5 of the Utility Report included as Appendix M.2 of this SCEA. Furthermore, the Project would implement any necessary new lines, connections, and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. Therefore, operation of the Project would not result in significant impacts related to electrical power.

**Overall, based on the above, construction and operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities and would not result in the construction of new electricity facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Thus, impacts would be less than significant.**

### Cumulative Impacts

**Less Than Significant Impact.** The geographic context for a cumulative analysis regarding electricity is LADWP's service area. Implementation of the Project, in conjunction with the related projects, would cumulatively increase demand for electricity supplies and infrastructure capacity. The Project would account for approximately 0.02 percent of LADWP's projected sales for the Project's build-out year. Although future development would result in the irreversible use of renewable and nonrenewable

[205] *LADWP, 2022 Power Strategic Long-Term Resources Plan, 2022, Appendix A, Table A-1.*

electricity resources during project construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2022 Power Strategic Long-Term Resources Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resources Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resources Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area***. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.***

### Natural Gas

#### Construction

Construction activities, including the construction of the new buildings and associated facilities, typically do not involve the consumption of natural gas. Accordingly, no demand for natural gas would be generated by construction. However, the Project would require construction of new natural gas mains to serve the new building. Construction impacts associated with natural gas infrastructure would primarily be confined to trenching for utility lines and connections to public infrastructure. Installation of natural gas infrastructure would be limited to on-site distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, as part of the Project, a Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see Project Design Feature TR-PDF-1 under Item XVII, Transportation). Installation of any required natural gas infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, construction of the Project would not result in significant impacts related to natural gas.

#### Operation

As a public utility, the SoCal Gas is under jurisdiction of the California Public Utilities Commission (CPUC). Title 24 of the California Code of Regulations regulates energy consumption in new constructions. The standards regulate energy consumed in buildings for heating, cooling, ventilation and lighting. Title 24 is implemented through the local plan check and permit process. In addition, the Project will comply with the City's All-Electric Buildings Ordinance, which would only permit the Project's proposed restaurant uses to utilize natural gas, resulting in a very limited Project demand for natural gas. SoCal Gas' 2024 Gas Report states that residential gas demand is expected to decrease at an annual average rate of 1.7 percent whereas commercial and industrial demand is expected to increase at an annual rate of 1.5 and 0.2 percent. This is mainly due to increased efficiency of power plants and the statewide efforts to use renewable sources of energy for electricity generation.

As shown in Table 13 on page 156, the Project is anticipated to generate a net decrease in the on-site demand for natural gas totaling approximately -197,907 cf per year. As such, the Project would be consistent with the forecasted 2028 consumption in SoCal Gas's planning area. A will serve letter was sent to SoCal Gas to determine if there is sufficient capacity to serve the Project. As discussed in the Utility Report, SoCal Gas has confirmed that there is sufficient capacity to serve the Project's natural gas demand. The will serve letter from SoCal Gas is included as Exhibit 6 of the Utility Report included as Appendix M.2 of this SCEA. Thus, operation of the Project would not result in significant impacts related to natural gas.

***Overall, based on the above, construction and operation of the Project would not result in an increase in demand for natural gas that would exceed available supply or distribution infrastructure capabilities and would not result in the construction of new natural gas facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative analysis of natural gas is SoCal Gas' service area. Buildout of the Project and related projects in SoCal Gas' service area could increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity; however, due to the restrictions on natural gas usage under the City's All-Electric Buildings Ordinance, such demand for natural gas within the City is anticipated to be limited. As outlined in the Utility Report, based on the 2024 California Gas Report, the California Energy Commission estimates natural gas consumption within SoCal Gas' planning area will be approximately 2.16 billion cf per day in 2029. The Project's -137,907 cf per year would result in a decrease in the on-site demand for natural gas; as such, the Project would be consistent with the forecasted consumption in SoCal Gas's planning area. SoCal Gas' forecasts consider projected population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. ***As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, cumulative impacts would be less than significant.***

### Telecommunications

**Less Than Significant Impact.** With regard to telecommunication facilities, the Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed residential and commercial uses. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. ***Thus, impacts related to telecommunication facilities would be less than significant.***

### Cumulative Impacts

**Less Than Significant Impact.** As listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA, there are seven related projects within 1 mile of the Project Site. Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. ***Thus, the Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.***

### b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Less Than Significant Impact.** Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, the Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the

available supplies during an average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2029).[206]

Based on the proposed land uses and the Project's resulting estimated water demand, the Project is subject to the requirements of SB 610. A WSA was approved for the Project by the LADWP Board of Commissioners on August 13, 2024, and is included in Appendix M.1 of this SCEA.[207] As shown in Table 32 on page 373, the Project would generate a net increase in water demand of 59,480 gpd after implementation of Code-required and voluntary (approximately 1,243 gpd savings) water conservation measures.

As stated in the WSA, the additional water demand of 59,480 gpd (67-acre feet per year) has been accounted for in the City's overall total demand projections in LADWP's 2020 UWMP using a service area-wide approach that does not rely on individual development demand. Furthermore, as stated in the WSA, the Project is consistent with the demographic forecasts for the City from SCAG's 2020 RTP/SCS, which serves as the basis for the 2020 UWMP's growth projections. Therefore, LADWP has determined that the Project water demand is included in the LADWP 2020 UWMP which forecasts adequate water supplies to meet all projected water demands in the City through the year 2045. As such, it is anticipated that sufficient water supplies will be available to serve the Project, and no new or expanded water entitlements will be needed. Impacts would be less than significant, and no mitigation measures are required.

**WAT-PDF-1:** In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- ENERGY STAR Certified Residential Clothes Washers—Front-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- California Friendly® plants or native plants (minimum 20 percent of total landscaping).
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Domestic water heating systems located in close proximity to points of use.
- Individual metering and billing for water use for commercial space.
- Individual submetering and billing for water use for the residential units.

***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.***

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[206] *Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021.*

[207] *LADWP Water Resources Division, Water Supply Assessment for the 6136 West Manchester Project, July 3, 2024.*

**Table 32**
**Estimated Project Water Demand**

| | No. of Units/ Floor Area | Water Use Factor (gpd/unit)[a] | Water Consumption (gpd) |
|---|---|---|---|
| **EXISTING** | | | |
| Auto Repair Shop and Restaurant | 21,911 sf | | 2,348 |
| **Total Existing to be Removed[c]** | | | **2,348** |
| **PROPOSED[b]** | | | |
| **Residential** | | | |
| Studio Apartment | 229 du | 75 | 17,175 |
| One-Bedroom Apartment | 166 du | 110 | 18,260 |
| One-Bedroom Live/Work | 6 du | 185 | 1,110 |
| Two-Bedroom Apartment | 88 du | 150 | 13,200 |
| Base Demand Adjustment (Residential Units)[d] | — | — | 5,529 |
| ***Residential Subtotal*** | ***489 du*** | | ***55,274*** |
| **Commercial and Residential Amenities** | | | |
| Recreation | 7,164 sf | 0.12 | 860 |
| Fitness[e] | 3,485 sf | 0.65 | 2,265 |
| Leasing/Lobby/Co-Work[f] | 3,995 sf | 0.12 | 479 |
| Lounge | 510 sf | 0.05 | 26 |
| Restaurant | 10,747 sf (573 seat) | 30 | 17,190 |
| Retail | 5,373 sf | 0.025 | 134 |
| Outdoor Kitchen | 1,387 sf | 0.13 | 180 |
| ***Subtotal Commercial and Residential Amenities*** | | | ***21,134*** |
| **Landscaping, Pool/Spa[g]** | 14,388 sf | — | 1,252 |
| **Covered Parking[h]** | 269,305 sf | 0.02 | 177 |
| **Total Proposed** | | | **77,837** |
| Less Required Ordinance Water Savings[i] | — | — | -14,766 |
| Less Existing to be Removed Total | | | -2,348 |
| Less Additional Conservation[j] | | | -1,243 |
| **Net Additional Water Demand** | | | 59,480 |

*sf = square feet*

*du = dwelling unit*

*gpd = gallons per day*

[a] *Indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at https://engpermitmanual.lacity.org/sewer-s-permits/technical-procedures/sewage-generation-factors-chart.*

[b] *Provided by City of Los Angeles Department of City Planning in the Request for WSA letter and Scope Confirmation e-mail. See Appendix A of the WSA. Existing and proposed uses that do not have a water demand are not shown here..*

**Table 32**
**Estimated Project Water Demand**

| | No. of Units/ Floor Area | Water Use Factor (gpd/unit)[a] | Water Consumption (gpd) |
|---|---|---|---|
| [c] *The existing water demand is based on the LADWP billing data from March 2019 to February 2024.* | | | |
| [d] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.* | | | |
| [e] *For a conservative water demand estimate, fitness is assumed to be health club/spa.* | | | |
| [f] *For a conservative water demand estimate, leasing/lobby/co-work is assumed to be conference room.* | | | |
| [g] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.* | | | |
| [h] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.* | | | |
| [i] *Water savings for plumbing fixtures and appliances due to current codes.* | | | |
| [j] *Water conservation due to additional conservation measures to be incorporated by the Applicant.* | | | |
| *Source: LADWP, Water Supply Assessment for the 6136 W. Manchester Project, prepared on July 3, 2024. See Table I in the WSA, included as Appendix M.1 of this SCEA, for water demand associated with Project* | | | |

**Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative analysis of water supply is the LADWP service area. LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with the related projects outlined in Table 36 on page 390, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. It is unknown whether or not the related projects or other developments in the LADWP service area have been taken into account in the 2020 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2020 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a WSA pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. **Therefore, cumulative impacts on water supply would be less than significant.**

**c. Would the project 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.**

### Construction Impacts

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows and impacts would be less than significant.

### Operational Impacts

The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. The Project Site lies within the Hyperion Sanitary Sewer System. The Project Site is within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. LASAN is responsible for the operation of wastewater treatment facilities in the City.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HTP. The HTP has a capacity of approximately 550 mgd (consisting of 450 mgd at the Hyperion Water Reclamation Plant (HWRP), 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant). The current average daily wastewater flow for the system is approximately 300 mgd. Accordingly, the remaining available capacity at the HTP is approximately 250 mgd.

As analyzed in the Utility Report and shown in Table 33 on page 376, the existing uses on the Project Site generate approximately 5,252 gpd of wastewater. As shown in Table 33, the Projects estimated wastewater generation is approximately 829,819 gpd, or 0.83 mgd. When accounting for existing uses to be removed, the net increase in sewer demand for the Project Site is 824,567 gpd (0.82 mgd). This is equal to less than one percent of the Hyperion Service Area capacity where the Project's wastewater would be treated. As such, the HTP has the capacity to treat the additional wastewater flows generated from the Project. This determination was confirmed in the SCAR response. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment within the Hyperion Service Area. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project.

As discussed above, a SCAR response, which is included in the Utility Report (see Exhibit 4B of Appendix M.2 of this SCEA), was obtained from LASAN. This SCAR response confirms the capability of the existing wastewater system to serve the Project's estimated wastewater flow. In addition, as also previously discussed, KPFF conducted additional sewer capacity analysis to determine the impact of adding the Project's anticipated sewage generation, as summarized in Table 5 of the Utilities Report. As determined therein, the Project's additional sewer flow is not expected to exceed the trigger flow, thereby initiating the planning for a relief or replacement sewer. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and

**Table 33**
**Estimated Project Wastewater Generation**

| | No. of Units/ Floor Area | Sewage Generation Factor (gpd/unit)[a] | Total Generation (gpd) |
|---|---|---|---|
| **EXISTING TO BE REMOVED** | | | |
| Auto Shop & Repair Garage | 19,708 | 0.08 | 1,577 |
| Restaurant[b] | 147 seats | 25 | 3,675 |
| ***Total Existing to be Removed*** | | | ***5,252*** |
| **PROPOSED** | | | |
| **Residential** | | | |
| Studio Apartment | 229 du | 75 | 17,175 |
| One-Bedroom Apartment | 166 du | 110 | 18,260 |
| One-Bedroom Live/Work Apartment | 6 du | 110 | 660 |
| Two-Bedroom Apartment | 88 du | 150 | 13,200 |
| ***Residential Subtotal*** | **489 du** | | ***49,295*** |
| **Commercial and Residential Amenities** | | | |
| Restaurant[b] | 10,747 sf (573 seat) | 30 | 17,190 |
| Retail | 5,373 sf | 0.025 | 134 |
| Sewer Ejector (Restaurant) | 2 units | 64,800 | 129,600 |
| Sewer Ejector (Fire Suppression) | 2 units | 302,400 | 604,800 |
| Swimming Pool (Commercial with backwash filters)[c] | 28,800 | 1 | 28,800 |
| **Total Proposed** | | | **829,819** |
| **Net Wastewater Generation (Proposed – Existing)** | | | **824,567** |

*sf = square feet*

*du = dwelling unit*

*gpd = gallons per day*

*gal = gallons*

[a] *Based on sewage generation rates provided by LASAN Sewer Generation Rates Table (2012).*

[b] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf per seat for a conservative wastewater flow estimate.*

[c] *For a conservative water demand estimate, recreation space is assumed to be office building..*

[c] *Swimming Pool is conservatively assumed to be drained in one day. Assumed area = 2,220 SF. Assumed Depth = 6.5 FT. LADWP Evapotranspiration Assumption = 189 GPD. 1 GAL = 7.48 CF.*

*Source: KPFF Consulting Engineers, 6136 W. Manchester, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, October 2024.*

constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

***Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. Implementation of the Project in combination with the seven related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP has a capacity of approximately 550 mgd, and currently, the remaining available capacity at the HTP is approximately 250 mgd. The Project, which would generate much more wastewater than the related projects due to its size and land uses, would increase sewer demand by less than one percent of the Hyperion Service Area capacity. Thus, it can be assumed that the related projects would generate even less sewer demand. Furthermore, the related projects would have to demonstrate that the existing capacity of the sewer system would be able to accommodate the additional wastewater infrastructure demand created by the project. In addition, pursuant to LAMC Section 64.14, related projects would be required to obtain final approval of sewer capacity and connection permits during the Project's permitting process. ***Therefore, the HTP would have adequate capacity to serve the additional wastewater demand by the Project and future development projects within the HTP service area and no significant cumulative impacts would occur.***

**d. Would the project 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.** While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[208] Ten Class III landfills and one inert landfill are currently operating within the County.[209] In addition, there is one solid waste transformation facility within Los

[208] *Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.*

[209] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.*

Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[210]

Based on the 2021 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill disposal capacity for the City is estimated to be 137.09 million tons, with a total estimated daily disposal rate of 36,971 tons per day, and the remaining lifespan of each landfill ranges from 7 to 34 years.[211] The estimated remaining capacity for the County's Class III landfills available for City use is approximately 127.44 million tons.[212] The estimated remaining capacity for the County's Class III open to the Project Site is approximately 122.93 million tons as of December 31, 2021.[213] Azusa Land Reclamation, the permitted inert waste landfill serving the County, has an estimated 50.77 million tons of remaining capacity and an average daily in-County disposal rate of 1,292 tons per day. Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[214]

The following analysis quantifies the Project's construction and operation solid waste generation.

### Construction

The Project Site is currently developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated parking. To provide for the proposed improvements, the Project would replace the existing uses with a new approximately 416,915-square-foot building comprised of 489 residential apartment units (inclusive of 64 Very Low-Income Households) and 16,120 square feet of ground-floor commercial space. Upon completion, the Project would result in up to 416,915 square feet of floor area within the Project Site. As shown in Table 34 on page 379, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate approximately 1,698 tons of demolition waste associated with the removal of existing uses, and 909 tons of construction waste, resulting in a total of 2,607 tons of waste prior to recycling.

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[210] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.*

[211] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.*

[212] *Total excludes Class III landfills not available for use by the City of Los Angeles for disposal (i.e., Burbank, Pebbly Beach, San Clemente, School Canyon, and Whittier) according to the 2021 Annual Report.*

[213] *The Class III landfills open to the Project Site are those open to the City, not including the Calabasas landfill as use of this landfill is limited to the Calabasas Wasteshed, as defined by Los Angeles County Ordinance No. 91-0003, which is composed of the incorporated cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks; that portion of the City of Los Angeles bordered by the northerly line of Township 2 North on the north, Interstate Highway 405 on the east, Sunset Boulevard and the Pacific Ocean on the south, and the City boundary on the west; and certain unincorporated areas in the Counties of Los Angeles and Ventura.*

[214] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.*

**Table 34**
**Project Construction Waste Generation**

| Building | Size | Generation Rate (lbs/sf)[a,b] | Total (tons)[b] |
|---|---|---|---|
| **Demolition Waste** | | | |
| Commercial | 21,911 sf | 155 | 1,698 |
| **Construction Waste** | | | |
| Residential (489 du) | 400,795 sf | 4.38 | 878 |
| Commercial | 16,120 sf | 3.89 | 31 |
| *Construction Waste Subtotal* | | | *909* |
| *Total Demolition and Construction Waste* | | | *2,607* |
| **Total After 75-Percent Recycling** | | | **652** |

*du = dwelling units*

*lbs/sf = pounds per square feet*

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4, Table 5, and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded and may not add up exactly.*

*Source: Eyestone Environmental, 2024.*

Pursuant to the requirements of SB 1374,[215] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its nonhazardous demolition and construction debris. In addition, 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. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earthlike waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 34, after accounting for mandatory recycling, the Project would result in approximately 652 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 50.77 million tons.[216]

It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction

[215] *Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.*

[216] *(652 tons ÷ 50.77 million tons) * 100 = 0.001 percent.*

sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

**Operation**

As shown in Table 35 on page 381, upon full buildout, the Project would result in a net increase in solid waste generation of 289 tons per year. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[217]

The Project's estimated annual net increase of 289 tons represents approximately 0.0002 percent of the remaining capacity (122.93 million tons) for the County's Class III landfills open to the Project Site.[218] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2021 Annual Report, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2021 Annual Report.

***Overall, based on the above, construction and operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Thus, impacts would be less than significant.***

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[217] *City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.*

[218] *289 tons per year ÷ 122.93 million tons x 100 = 0.0002 percent*

**Table 35**
**Estimated Project Solid Waste Generation**

| Land Use | Size | Employee Generation Rate[a] | Estimated No. of Employees | Solid Waste Generation Rate[b,c] | Total Generation (tons/year) |
|---|---|---|---|---|---|
| **Existing to Be Removed** | | | | | |
| Retail | 19,708 sf | 0.002 | 39 | 1.96 tn/emp/yr | 77 |
| Restaurant | 2,203 sf | 0.004 | 9 | 1.92 tn/emp/yr | 17 |
| *Total Existing to Be Removed* | | | | | 94 |
| **Proposed** | | | | | |
| Residential | 489 du | N/A | N/A | 2.23 tn/du/yr | 1,090 |
| Commercial | | | | | |
| Restaurant | 10,747 sf | 0.004 | 43 | 1.96 tn/emp/yr | 21 |
| Retail | 5,373 sf | 0.002 | 11 | 1.92 tn/emp/yr | 83 |
| *Total Proposed* | | | | | 1,194 |
| **Total Net Increase (prior to diversion)** | | | | | **1,100** |
| **Total Net Disposal (after 76.4% diversion)[d]** | | | | | **289** |

*du = dwelling units*

*emp = employees*

*tn = tons*

*yr = year*

[a] *Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.*

[b] *Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide.*

[c] *Non-residential yearly solid waste generation factors from CALRecycle's 2014 Waste Characterization Study, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed June 25, 2024. Based on the generation rate of 1.96 ton per employee per year (Retail Trade–All Other) and the generation rate of 1.92 ton per employee per year (Restaurants).*

[d] *Consistent with the current Citywide diversion rate of 76.4 percent.*

*Source: Eyestone Environmental, 2024.*

## Cumulative Impacts

**Less Than Significant Impact.** Given the level of urbanization present throughout the Project vicinity, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2021 CoIWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2036) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual

CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. **As such, the Project's contribution during operation would not be cumulatively considerable, and cumulative impacts with regard to solid waste disposal capacity from operations would be less than significant.**

**e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**Less Than Significant Impact.** Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[219] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[220] 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. Additionally, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan,

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[219] *Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.*

[220] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/L.A.'s Green New Deal.

***Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, impacts would be less than significant.***

**Cumulative Impacts**

**Less Than Significant Impact.** Like the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. Specifically, the Project and related projects would be required to promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAn/L.A.'s Green New Deal. ***Therefore, construction and operation of the Project and the related projects would comply with applicable state or City solid waste regulations and would not result in significant cumulative impacts. As such, the Project's contribution during construction 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? | ☐ | ☐ | ☐ | ☒ |

**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 VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measures included in Mitigation Measure PMM-WF-1 from the 2020–2045 RTP/SCS PEIR 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, Mitigation Measure PMM WF-2 from the 2020–2045 RTP/SCS PEIR are not applicable to the Project.

**SCAG 2024–2050 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 reduce 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 features, such as:

- Ember-resistant vents
- Fire-resistant roofs
- Surrounding defensible space
- Proper maintenance and upkeep of structures and surrounding area

l) Explore and implement new strategies and better roadway easement management to minimize fire ignitions along roadways.

m) Coordinate with CAL FIRE, local Fire Safe Councils, and homeowners' associations to implement FireWise Communities, implement restoration projects that remove highly flammable non-native grasses, and improve habitat via restoration projects at the Wildland Urban Interface.

***Applicability to the Project***

As described in the impact analysis below, the Project Site is not located in an area classified as a VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measures included in Mitigation Measure PMM-WF-1 from the 2024–2050 RTP/SCS PEIR 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 to:

1) Submit a fire protection plan including the designation of fire watch staff;

2) Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;

3) Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and

4) 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, Mitigation Measure PMM WF-2 from the 2024–2050 RTP/SCS PEIR are not applicable to the Project.

### Impact Analysis

**a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

**b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**c. Would the project 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. Would the project 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-d).** The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated VHFHSZ or Wildfire Severity Zone.[221,222] Therefore, these thresholds would not apply to the Project. ***No impacts regarding wildfire risks would occur, and no mitigation measures are required.***

### Cumulative Impacts

**Less Than Significant Impact**. As listed in Table 36 on page 390 and shown in Figure 18 on page 391 of this SCEA, there are seven related projects within 1 mile of the Project Site. Similar to the Project, the related projects are located in highly urbanized areas and would not contain wildland features or be located adjacent to any wildland areas. As with the Project, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards, including those required of properties within the VHFHSZ (all of the related projects are not located within the VHFHSZ). Nevertheless, similar to the Project, all related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. ***As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and impacts would be less than significant.***

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[221] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 4123-004-010 and 4123-004-011. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" of the Los Angeles General Plan Safety Element.*

[222] *City of Los Angeles Emergency Management Department, City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 13-8, p. 13-10.*

# XXI. MANDATORY FINDINGS OF SIGNIFICANCE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☐ | ☐ | ☒ | ☐ |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

**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 Item I through Item XX above, with adherence to regulatory compliance measures and implementation of project design features 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 developed with a Pep Boys Auto Shop, a Del Taco drive-through fast-food restaurant, and associated surface parking. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project. 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 Mitigation Measures PMM BIO-1(g) and PMM BIO-1(i) from the 2020–2045 and 2024–2050 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 Item V, Cultural Resources, Item VII, Geology and Soils, and Item XVIII, Tribal Cultural Resources, with implementation of relevant mitigation measures regarding the potential inadvertent discovery of archaeological resources (Mitigation Measures PMM CULT-2 [k and l] from the 2020–2045 and 2024–2050 RTP/SCS PEIR MMRP) and paleontological resources (Mitigation Measure GEO-MM-1), and with incorporation of Mitigation Measures TCR-MM-1 through TCR-MM-3 regarding the accidental discovery of a tribal cultural resource, impacts to archeological, paleontological, 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 seven related projects listed in Table 36 on page 390 and shown in Figure 18 on page 391. The list of related projects is based on information provided by LADOT in February 2024, and other recent studies, and include developments within a 1-mile radius of the Project Site. Although these related 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 seven 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 addressed above area are contained under Item II through Item XX 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 with Mitigation Incorporated.** Based on the analyses contained under Item I through Item XX above, the Project could result in potentially significant impacts with regard to Biological Resources, Cultural Resources (Archaeological Resources), Geology and Soils (Paleontological Resources), Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. However, as outlined above, all of these potentially significant impacts would be reduced to less than significant levels with implementation of applicable mitigation measures. Therefore, the Project would not have significant environmental effects on human beings, either directly or indirectly.

**Table 36**
**Related Projects[a]**

| No. | Project Name/Address | Description | Unit/Area |
|---|---|---|---|
| 1 | Airport Boulevard Car Wash<br>9204 South Airport Blvd. | Self-Service Car Wash Facility | 15,380 sf |
| 2 | 9800 South Sepulveda Blvd. | Hotel | 178 rm |
| 3 | Charter Middle School<br>8540 South La Tijera Blvd. | School | 525 stu |
| 4 | 8521 South Sepulveda Blvd. | Apartment | 86 du |
| | | Commercial | 561 sf |
| 5[b] | Kite Crossing Apartments<br>8333 Airport Boulevard | Residential (including permanent supportive housing) | 101 du |
| 6[c] | Dinah's Sepulveda Project<br>6501–6521 South Sepulveda | Apartment | 362 du |
| | | Commercial | 3,700 sf |
| 7 | 9000 Airport Boulevard | Industrial (Option 1) | 435,390 sf |
| | | Industrial (Option 2) | 410,056 sf |

*sf = square feet*

*rm = room*

*stu = students*

*du = dwelling units*

[a] *Related project information provided by the Los Angeles Department of Transportation in February 2024.*

[b] *Trip generation estimated using rates from Trip Generation, 11th Edition, Institute of Transportation Engineers, 2021.*

[c] *This related project is located outside the 0.5-mile study radius but has been included for conservative analysis.*

*Source: Gibson Transportation Consultants, Inc and Eyestone Environmental, 2024.*

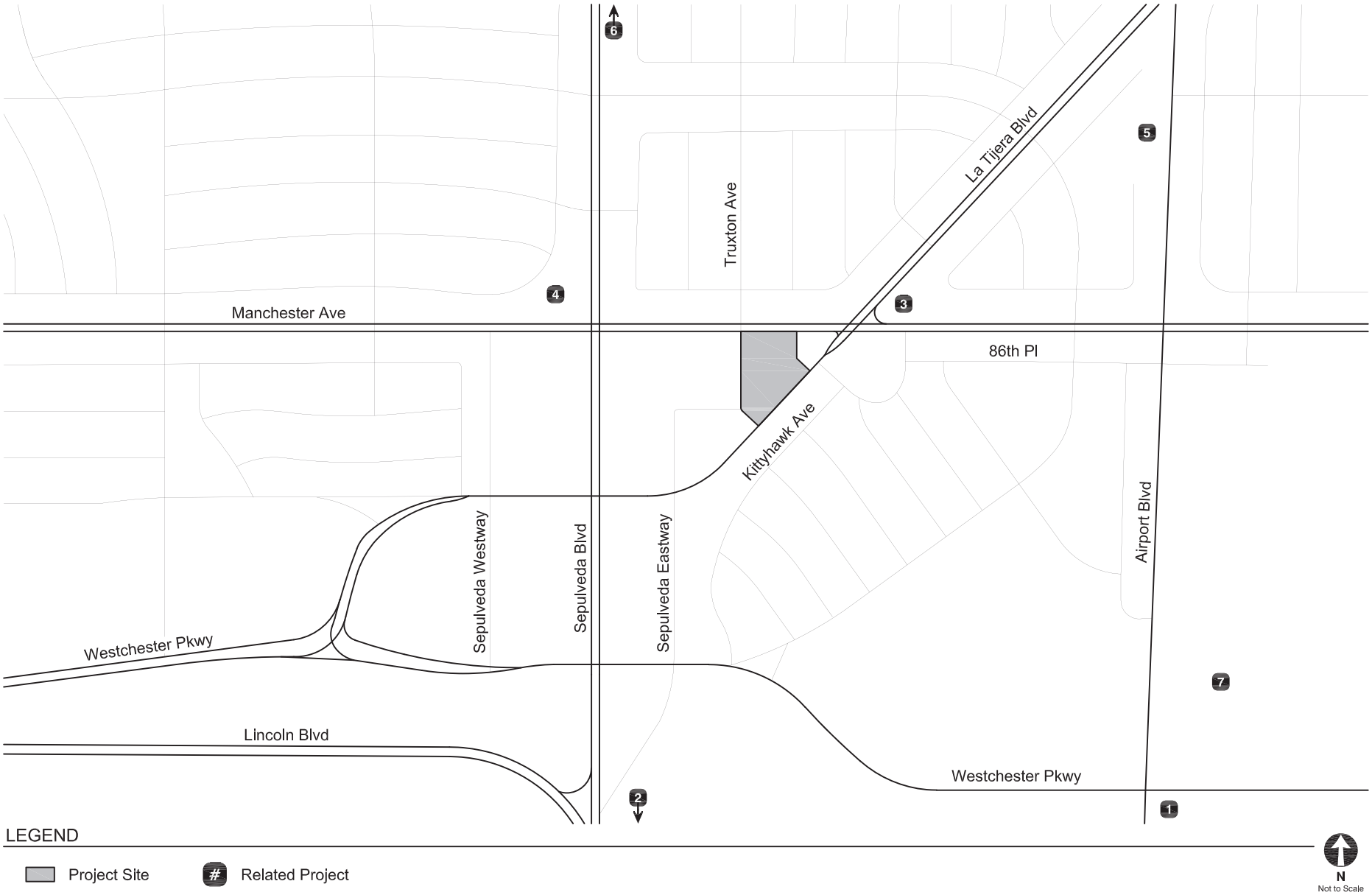


**Figure 18**
Related Projects

Source: Gibson Transportation Consulting, Inc., 2024.

# 6 MITIGATION MONITORING PROGRAM

## 6.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A SCEA has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the SCEA takes into consideration the project design features (PDFs) and incorporates all feasible mitigation measures from all Program Environmental Impact Reports (PEIRs) applicable to the Project Site and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

## 6.2 ORGANIZATION

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency: the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

## 6.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

## 6.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

# 6.5 MITIGATION MONITORING PROGRAM

## I. Biological Resources

**Mitigation Measure BIO-MM-1:** The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.
- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; California Department of Fish and Wildlife
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

**2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

**2020–2045 RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction

- **Monitoring Frequency:** Once, prior to issuance of grading permits; or, if vegetation removal, building demolition, or grading is initiated during the nesting season, as determined by a qualified biologist (provide proof of compliance)
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

**2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits
- **Action(s) Indicating Compliance**: Issuance of applicable building permit

**2024–2050 RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits; or, if vegetation removal, building demolition, or grading is initiated during the nesting season, as determined by a qualified biologist (provide proof of compliance)
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

## II. Cultural Resources (Archaeological Resources)

**2020–2045 RTP/SCS Mitigation Measure PMM CULT-1 (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.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction

- **Monitoring Frequency:** To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist; issuance of building permit(s)

**2020–2045 RTP/SCS Mitigation Measure PMM CULT-1 (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.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist; issuance of building permit(s)

**2024–2050 RTP/SCS Mitigation Measure PMM CULT-1 (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.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist; issuance of building permit(s)

**2024–2050 RTP/SCS Mitigation Measure PMM CULT-1 (l):** Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant. If the

archaeologist determines that the discovery is significant, it should be curated with a recognized scientific or educational repository.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** To be determined by consultation with archaeologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified archaeologist; issuance of building permit(s)

## III. Geology and soils (Paleontological Resources)

**GEO-MM-1:** In the event that any paleontological resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** To be determined by consultation with paleontologist if resource(s) are discovered
- **Action Indicating Compliance:** If unanticipated discoveries are found, submittal of compliance report by a qualified paleontologist

## IV. Hazards and Hazardous Materials

**Mitigation Measure HAZ-MM-1:** A Soil Management Plan (SMP) will be developed and implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility in accordance with all applicable regulatory requirements.

- The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- As part of the soil management plan, a registered environmental professional, and/or his/her designee, in his or her reasonable discretion, shall be present

on the Project Site during grading and excavation activities and shall be on call at other times to monitor compliance with the soil management plan.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

## V. Noise

**Mitigation Measure NOI-MM-1:** Prior to commencement of construction, the Project Applicant shall erect temporary and impermeable sound barriers at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. The temporary sound barriers shall be in place for the duration of the Project construction, from demolition through building exterior wall/window enclosure. The temporary sound barriers shall be opaque and have a minimum Sound Transmission Class (STC) rating of 25.

- Within the southern portion of the Project Site between the construction areas and residential uses on the south side of La Tijera Boulevard (receptor location R1). The temporary sound barrier shall be designed with a minimum of 6 feet tall and to provide a minimum 5-dBA dBA noise reduction at the ground and upper levels of receptor location R1. The temporary sound barrier shall be designed to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor location R1.
- Within the northern portion of the Project Site between the construction areas and the residential uses on the north side of Manchester Avenue (receptor location R2). The temporary sound barrier shall be designed with a minimum of 8 feet tall and to provide a minimum 7-dBA noise reduction at the ground and upper levels of the residential uses at receptor location R2. The temporary sound barrier shall be designed to block line of sight between the on-site construction activities and off-site sensitive receptors at receptor location R2.
- **Enforcement Agency:** City of Los Angeles Department of City Planning or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once at field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; submittal of compliance report from noise consultant.

## VI. Public Services—Police Protection

**Project Design Feature POL-PDF-1:** During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodically during field inspection
- **Action(s) Indicating Compliance:** Field inspection sign-off

**Project Design Feature POL-PDF-2:** The Project will include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Project Design Feature POL-PDF-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Project Design Feature POL-PDF-4:** The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection

- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Project Design Feature POL-PDF-5:** The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Project Design Feature POL-PDF-6:** Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Completion of construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy

## VII. Transportation

**Project Design Feature TR-PDF-1:** Pursuant to City's requirements, prior to the start of construction, a Construction Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan will include, but not be limited to, the following measures, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers ;

- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading or building permit; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

## VIII. Tribal Cultural Resources

**Mitigation Measure TCR-MM-1:** Prior to any ground disturbing activities on the project site associated with the Proposed Project, the project proponent shall retain a tribal consultant and qualified archaeologist. Ground disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the Project site. A qualified archaeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology and the Society for California Archaeology's qualifications for a principal investigator. A tribal consultant is defined as one who is on the NAHC's Tribal Contact list. The qualified archaeologist and tribal consultant shall submit a letter of retention demonstrating the qualifications to the Project proponent and City of Los Angeles, Department of City Planning (City Planning) no fewer than 15 days before ground-disturbing activities commence.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; monitoring to be determined by tribal consultant and/or qualified archaeologist
- **Action(s) Indicating Compliance:** Submittal of a letter of retention demonstrating the qualifications to the Project proponent; If discoveries are

found, submittal of compliance documentation by tribal consultant and/or qualified archaeologist.

**Mitigation Measure TCR-MM-2:** Prior to the commencement of ground-disturbing repair activities, at the project kickoff, the qualified archaeologist and tribal consultant or their designees will provide a briefing to construction crews to provide information on regulatory requirements for the protection of tribal cultural resources. As part of this training, construction crews will be briefed on proper procedures to follow should unanticipated discoveries of tribal cultural resources be made during construction. Workers will be provided contact information and protocols to follow if inadvertent discoveries are made in the event these discoveries are made. Additionally, workers will be shown examples of the types of resources that would require notification. The training will include a summary of the applicable regulations and penalties for non-compliance. A copy of the training materials and a list of attendees will be provided to City Planning no more than 10 days after completing the training.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check
- **Action(s) Indicating Compliance:** Submittal of a copy of the training materials and a list of attendees no more than 10 days after completing the training.

**Mitigation Measure TCR-MM-3:** Should potential tribal cultural resources be encountered by construction crews during ground-disturbing activities, such activities in the vicinity of the potential resource shall be temporarily halted and the archaeologist and tribal consultant retained for the Proposed Project shall be notified. If the archaeologist and/or tribal consultant determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City shall be notified and provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The project proponent would then implement the tribe's recommendations if the project's archaeologist reasonably concludes that the tribe's recommendations are reasonable, feasible, and based on substantial evidence. The recommendations would then be incorporated into a tribal cultural resources treatment and monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. During the assessment of such encountered potential tribal cultural resources, ground disturbance activities may be recommenced outside of a specified radius of the discovery site, so long as this radius has been reviewed and determined to be reasonable and appropriate by the project's archaeologist and tribal consultant.

- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check
- **Action(s) Indicating Compliance:** Submittal of a letter of retention demonstrating the qualifications to the Project proponent; If discoveries are

found, submittal of compliance documentation by tribal consultant and/or qualified archaeologist.

## IX. Utilities And Service Systems—Water Supply

**Project Design Feature WAT-PDF-1:** In addition to regulatory requirements, the Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- ENERGY STAR–Certified Residential Clothes Washers—Front-loading with Integrated Water Factor of 3.0 or less and capacity of 4.8 cubic feet.
- High Efficiency Toilets with a flush volume of 1.1 gallons per flush, or less.
- California Friendly® plants or native plants (minimum 20 percent of total landscaping).
- Drip/Subsurface Irrigation (Micro-Irrigation).
- Proper Hydro-Zoning/Zoned Irrigation (groups plants with similar water requirements together).
- Domestic water heating systems located in close proximity to points of use.
- Individual metering and billing for water use for commercial space.
- Individual submetering and billing for water use for the residential units.
- **Enforcement Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once prior to issuance of Certificate of Occupancy
- **Action(s) Indicating Compliance:** Plan approval and issuance of applicable building permit; Issuance of Certificate of Occupancy