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

Sustainable Communities Environmental Assessment

South Park Towers Project

Case Number: ENV-2018-3337-SCEA

Project Location: 1600-1618 S. Flower St., 1601-1623 S. Hope St., 426-440 W. Venice Blvd., Los Angeles, CA 90015

Community Plan Area: Central City

Council District: 14 – Kevin de León

Project Description: The South Park Tower Project includes the demolition of four commercial office/retail buildings totaling 89,510 square feet and the construction of a 452,630 square-foot, two-tower, mixed-use development on a 75,503 square-foot site, with a maximum building height of 260 feet, and a floor area ratio (FAR) of 6:1. Tower 1 would occupy the western portion of the Project Site and includes a 22-story hotel with 300 guest rooms and 3,120 square feet of ground floor restaurants. Tower 2 would occupy the eastern portion of the Project Site and includes a 23-story residential building with 250 dwelling units and 10,000 square feet of ground floor medical offices.

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

PREPARED BY:
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APPLICANT:
Venice Hope Group, LLC

October 2023

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B.2: Department of Building and Safety, Grading Division, Soils Report Approval Letter (Log #102587), April 11, 2018.

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GeoKinetics, Inc., Preliminary Subsurface Methane Gas Investigation at 1600 South Flower Street, March 9, 2018.

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F.1: Los Angeles Department of Transportation, Updated Transportation Impact Analysis for the Proposed South Park Towers Mixed-Use Project at 1600 South Flower Street / 426 and 440 West Venice Boulevard, LADOT Case #CEN18-17190, January 6, 2020.

The Mobility Group, South Parks Towers Project, VMT Analysis and TDM Measure Descriptions, December 9, 2019.

F.2: The Mobility Group, South Park Towers Project, Draft Transportation Study, April 2019. (Non-CEQA Transportation Analysis)

APPENDIX G: ENERGY CONSUMPTION WORKSHEETS

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The Tree Resource, Protected Tree Report, 1600 S. Flower St. 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018.

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I.1: Jenna Snow and Kathryn McGee, Historic Preservation Consulting, Historic Resource Assessment, 1601-1617 South Hope Street, 1600-1616 South Flower Street, Los Angeles, CA, December 2018

I.2: Dudek, Ground Penetrating Radar Investigation Results and Archaeological Resources Recommendations for the South Park Towers Project, Los Angeles, California, December 14, 2018.

I.3: Natural History Museum, Paleontological Resources for the Proposed Hope and Venice Project in the City of Los Angeles, Los Angeles County, Project Area, June 14, 2018.

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Dudek, Tribal Cultural Resources Report for The South Park Towers Project, City of Los Angeles, Los Angeles County, California, November 2018.

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Francis Krahe & Associates, Lighting Technical Study, November 20, 2018.

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L.1 Los Angeles Department of Water and Power, Board of Water and Power Commissioners, Resolution 023016, June 2, 2022

L.2. Los Angeles Department of Water and Power, Water Resources Division, Water Supply Assessment, The South Park Towers Project, May 31, 2022.

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Section 1. Introduction

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

1.1 Purpose of Environmental Review

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

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

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

1.2 Background Information on Senate Bill 375 and the SCEA

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

The Southern California Association of Governments (SCAG) is the MPO 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 approved and adopted the Connect SoCal plan (2020–2045 RTP/SCS) which sets forth goals, policies, and programs intended to reduce greenhouse gas emissions, improve active transportation, and promote development near

existing transportation networks. The Connect SoCal Plan is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern within the SCAG region, including achieving CARB's GHG reduction goals. For the SCAG region, CARB revised its long-range GHG emissions reduction target at 19 percent below 2005 per capita emissions levels by 2035, which the 2020-2045 RTP/SCS intends to meet or exceed. On October 30, 2020, CARB officially determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA clearance for "transit priority projects" (as described below) that are consistent with SCAG's RTP/SCS. Acting as Lead Agency, the City of Los Angeles Department of City Planning required preparation of this SCEA to consider the potential project-specific and cumulative environmental impacts of the Project. This SCEA includes the same substantive environmental analysis as provided in an Initial Study/Mitigated Negative Declaration (IS/MND), but also includes additional discussion and analysis demonstrating that the Project meets the criteria for a Transit Priority Project (TPP) that qualifies for CEQA streamlining under SB 375.

1.3 Transit Priority Project (TPP) Criteria

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

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS;

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

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

4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.4 SCEA Process and Streamlining Provisions

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards or criteria set forth in the prior applicable EIRs (i.e., SCAG's 2020-2045 RTP/SCS Program EIR) and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:

a. Growth-inducing impacts, and
b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.

2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.

3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.

5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:

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

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

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

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

6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.5 Required Findings

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

1. The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the RTP/SCS prepared by SCAG;

2. The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2020-2045 RTP/SCS would, if implemented, achieve the greenhouse gas emission reduction targets;

3. The Project qualifies as a TPP pursuant to Public Resources Code Section 21155(b);

4. The Project is a residential mixed-use project as defined by Public Resources Code Section 21159.28(d);

5. The Project, as mitigated, incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including SCAG's RTP/SCS Program Environmental Impact Report and the Central City Redevelopment Plan EIR;

6. All potentially significant or significant effects required to be identified and analyzed pursuant to the CEQA have been identified and analyzed in an initial study; and

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

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.6 Organization of the SCEA

This SCEA is organized into seven sections as follows:

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

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

Section 3. SCEA Criteria: This section identifies the Transit Priority Project criteria and provides an analysis of the Project's consistency with all feasible mitigation measures, performance standards, and criteria from the Connect SoCal (2020-2045 RTP/SCS) Program EIR.

Section 4. Initial Study Checklist and Environmental Analysis: Each environmental issue identified in the SCEA Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects mitigation measures are provided to reduce such impacts to a less than significant level. This section also identifies mitigation measures from the Connect SoCal EIR that are applicable to the Proposed Project.

Section 5. Mitigation Monitoring Program: This section incorporates the Mitigation Monitoring Program (MMP), which has been prepared pursuant to Public Resources Code Section 21081.6 and Section 15097 of the State CEQA guidelines.

Section 6. Preparers and Persons Consulted: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

Section 7. References, Acronyms and Abbreviations: This section provides a list of reference materials and identifies commonly used acronyms and abbreviations that are used throughout the document.

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

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Section 2. Project Description

A. Project Summary

The proposed South Park Towers Project (Project) includes the demolition of four commercial retail/office buildings totaling 89,510 square feet of floor area and the new construction of a 452,630 square foot mixed-use project with 250 dwelling units, 300 hotel rooms and 13,120 square feet of ground floor commercial space. The resulting floor area ratio is 6:1. The Project would include two towers with a maximum height of approximately 260 feet above grade and 23 stories. Tower 1 would occupy the western portion of the Project Site and would include a 22-story hotel with 300 guest rooms (with 198,000 square feet of hotel floor area) and 3,120 square feet of ground floor restaurant space. Tower 2 would occupy the eastern portion of the Project Site and would include a 23-story building with 250 residential units (with 241,510 square feet of residential floor area) and 10,000 square feet of ground floor medical office space. A porte-cochere passenger drop-off zone would be provided on Venice Boulevard leading to a pedestrian paseo bifurcating the two towers at grade level. Vehicular access to both buildings would be provided via a full-access driveway on Hope Street. The Project would provide a total of 288 vehicle parking spaces and 252 bicycle parking spaces. Approximately 25,768 square feet of open space and amenity areas would be provided.

The Applicant is requesting the following discretionary actions: (1) Pursuant to LAMC Sec. 17.01 and 17.15, a Vesting Tentative Tract Map to create one master ground lot and to subdivide the site into four airspace lots for a high-density mixed-use Project;; (2) Pursuant to LAMC Sec. 14.5.6 B, a Transfer of Floor Area Rights (TFAR) for the transfer of approximately 226,121 square feet of floor area; (3) Pursuant to LAMC Sec. 12.24 W.1, a Conditional Use Permit (CUB) for the sale of a full-line of alcoholic beverages for on-site consumption only within the proposed hotel; (4) Site Plan Review pursuant to LAMC Sec. 16.05 for the construction of 250 dwelling units, 300 hotel rooms and 13,120 square feet of ground-floor commercial floor area; (5) Pursuant to LAMC Sec. 12.21 G, a Director's Determination to allow for up to a 10% reduction in the total required usable open space; (6) Pursuant to LAMC Sec. 12.24 S, a 20% decrease in the required parking for the hotel; and (7) Pursuant to LAMC Sec. 12.32 S, approval of a Supplemental Use Sign District (SN) to permit a sign district. The Project would also require approvals and permits from the City of Los Angeles (and other municipal agencies) for project construction activities including, but not limited to, the following: demolition, excavation, shoring, grading, foundation, building, haul route, street tree removal, and tenant improvements.

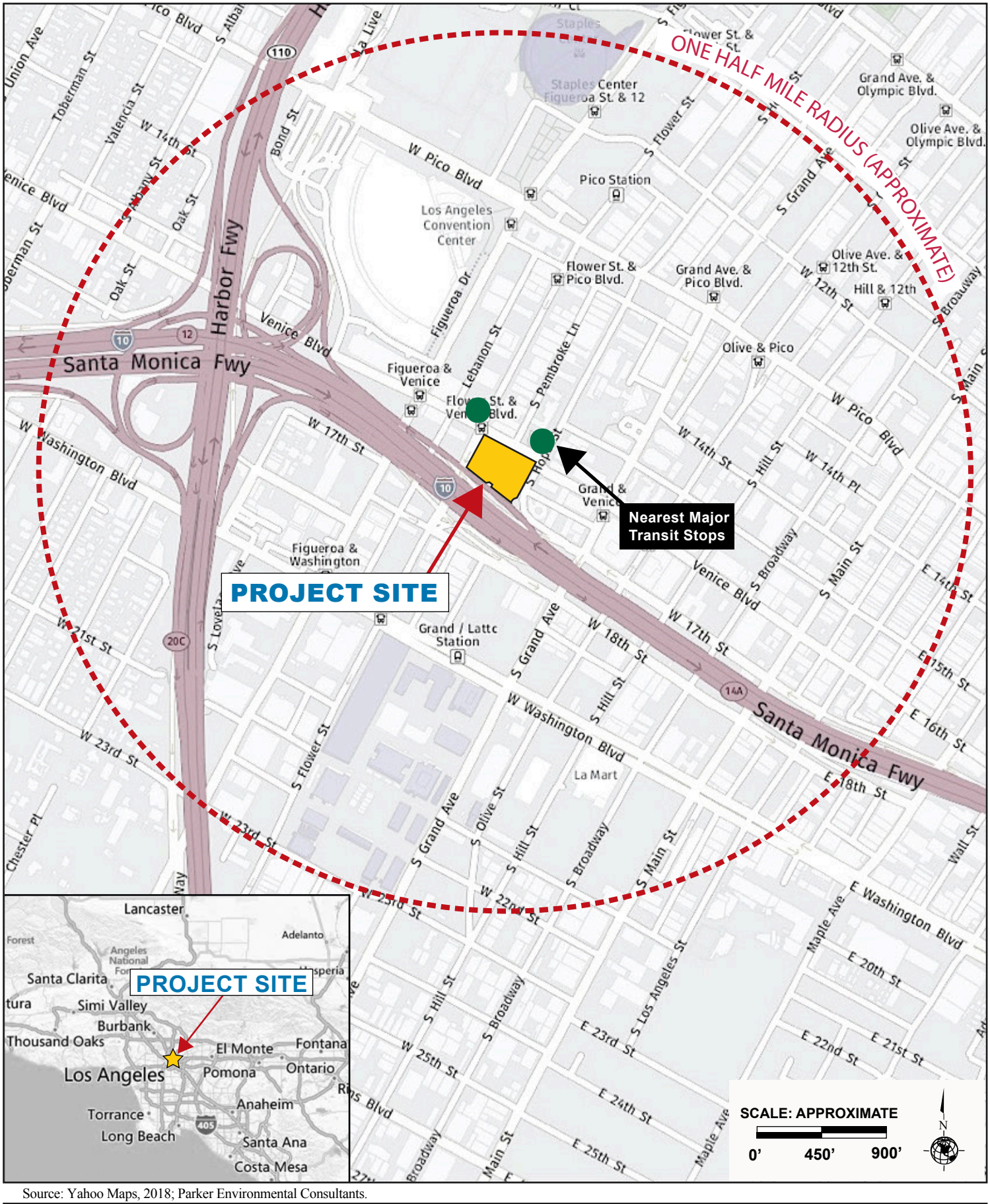
B. Environmental Setting

1. Project Location

The Project Site is located in the Central City Community Plan area and is within the boundaries of the South Park Neighborhood District of downtown Los Angeles, as identified by the City's Downtown Design Guide. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 2.1, Project Location Map. The Project Site includes one parcel with approximately 75,503 square feet of lot area (1.73 acres). The Project Site's Assessor's Parcel Number (APN) is 5134-008-006. The Project Site is generally bound by Flower Street to the west; Venice Boulevard to the north; Hope Street to the east; and an alleyway (on the southwest portion) and the Santa Monica Freeway (I-10) to the south.

The Project Site is bounded by Flower Street to the west, Hope Street to the east, Venice Boulevard to the north, and the Santa Monica Freeway (I-10) to the south. Regional vehicular access to the Project Site is provided primarily by the Santa Monica (I-10) Freeway and the Harbor/Pasadena Freeway (I-110/SR-110). The Santa Monica Freeway (I-10) runs east-west and is located immediately to the south of the Project Site. The Harbor/Pasadena Freeway runs north-south, and is located approximately 0.25 of a mile to the west of the Project Site. These two facilities also provide access to the Hollywood (US-101) and Golden State (I-5) freeways to the north, to the San Bernardino (I-10) and Pomona (SR-60) freeways to the east, and to the Santa Ana (I-5) freeway to the southeast.

Local street access is provided by a comprehensive grid roadway system of surface streets surrounding the Project Site. Flower Street, which borders the Project Site to the west, is a one-way southbound street providing two travel lanes in the southbound direction. Flower Street is designated as a Modified Avenue II between 6th Street and 11th Street and a Modified Avenue I south of 11th Street (adjacent to the Project Site) in the City's Mobility Plan 2035. Venice Boulevard, which borders the Project Site to the north, is a two-way street providing two travel lanes in each direction, with on-street parking generally provided in off-peak periods with some restrictions. Venice Boulevard is designated as a Modified Avenue II in the City's Mobility Plan 2035. Hope Street, which borders the Project Site to the east, is a two-way street providing one travel lane in each direction with a center two-way left turn lane, and on-street metered parking on either side with some restrictions. Hope Street is designated as a Collector Street between Venice Boulevard and 17th Street and an Avenue II roadway north of Venice Boulevard.



Source: Yahoo Maps, 2018; Parker Environmental Consultants.

Figure 2.1
Project Location Map

a. Public Transit

The Project Site is served by two nearby Metro Stations within a half-mile: the Pico Station which serves the Metro A Line and Metro E Line, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station which serves the Metro A Line and is located approximately 0.3 mile southeast of the Project Site. The Metro A and E Line at-grade railway immediately borders the Project Site to the west. The Project Site is currently served by a total of eight local and inner-city transit operators within approximately one-quarter mile of the Project Site, which include Metro, LADOT Downtown Area Shuttle operators, including Metro, LADOT Downtown Area Shuttle (DASH), Commuter Express (CE), Foothill Transit, Orange County Transportation Authority (OCTA), Santa Monica Big Blue Bus, Gardena Municipal Bus Lines, and Montebello Bus Lines. The Project Site is also situated within easy walking distance to retail, restaurants, entertainment, and other commercial businesses located in the Downtown area and in particular along Flower Street and Grand Avenue. Additional detailed information on transit services available on major streets in the Project vicinity, including transit maps and frequency of service is provided in Appendix G.2, Transportation Study.

2. Existing Conditions

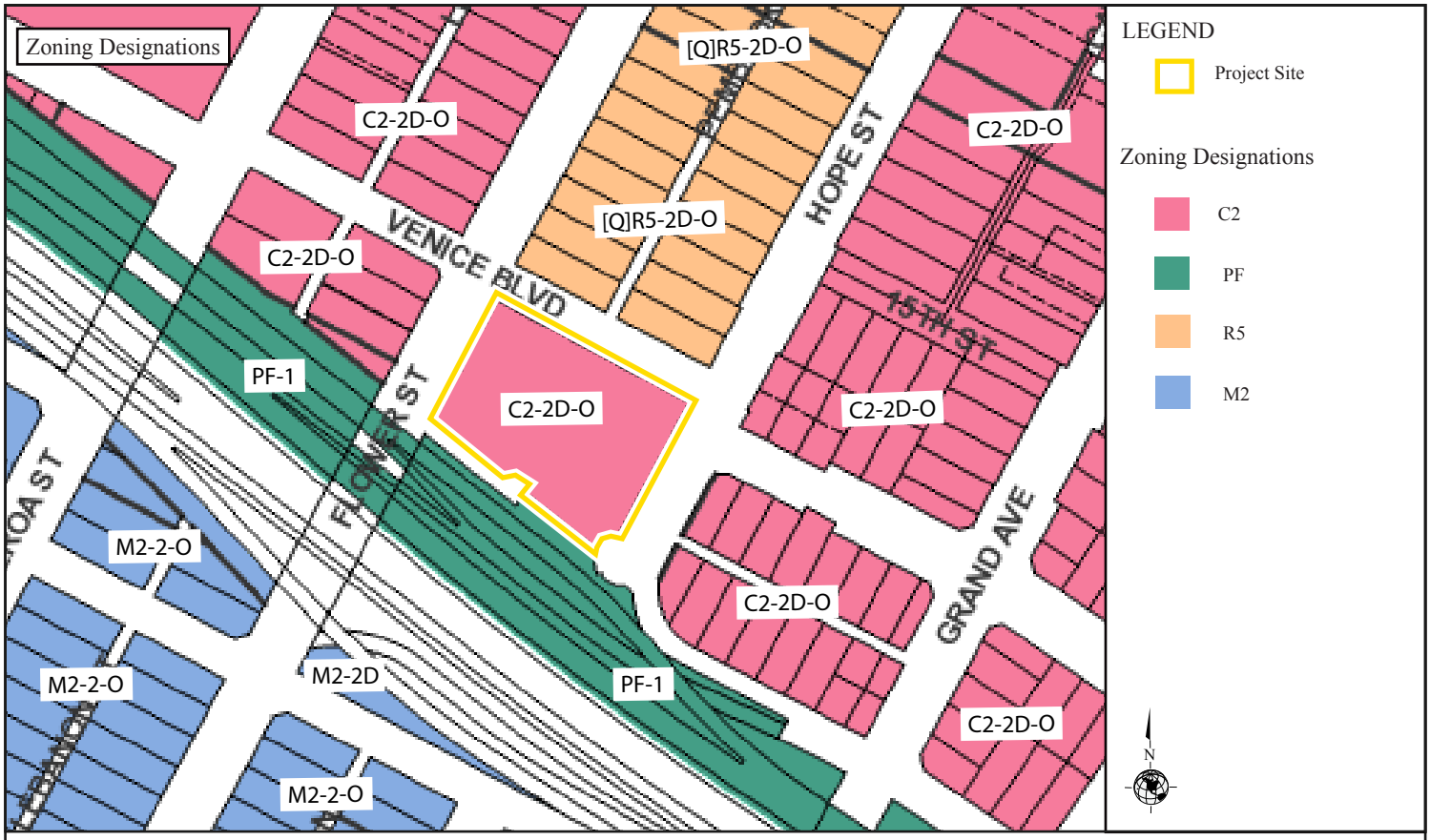
2.1 Zoning and Land Use Designations

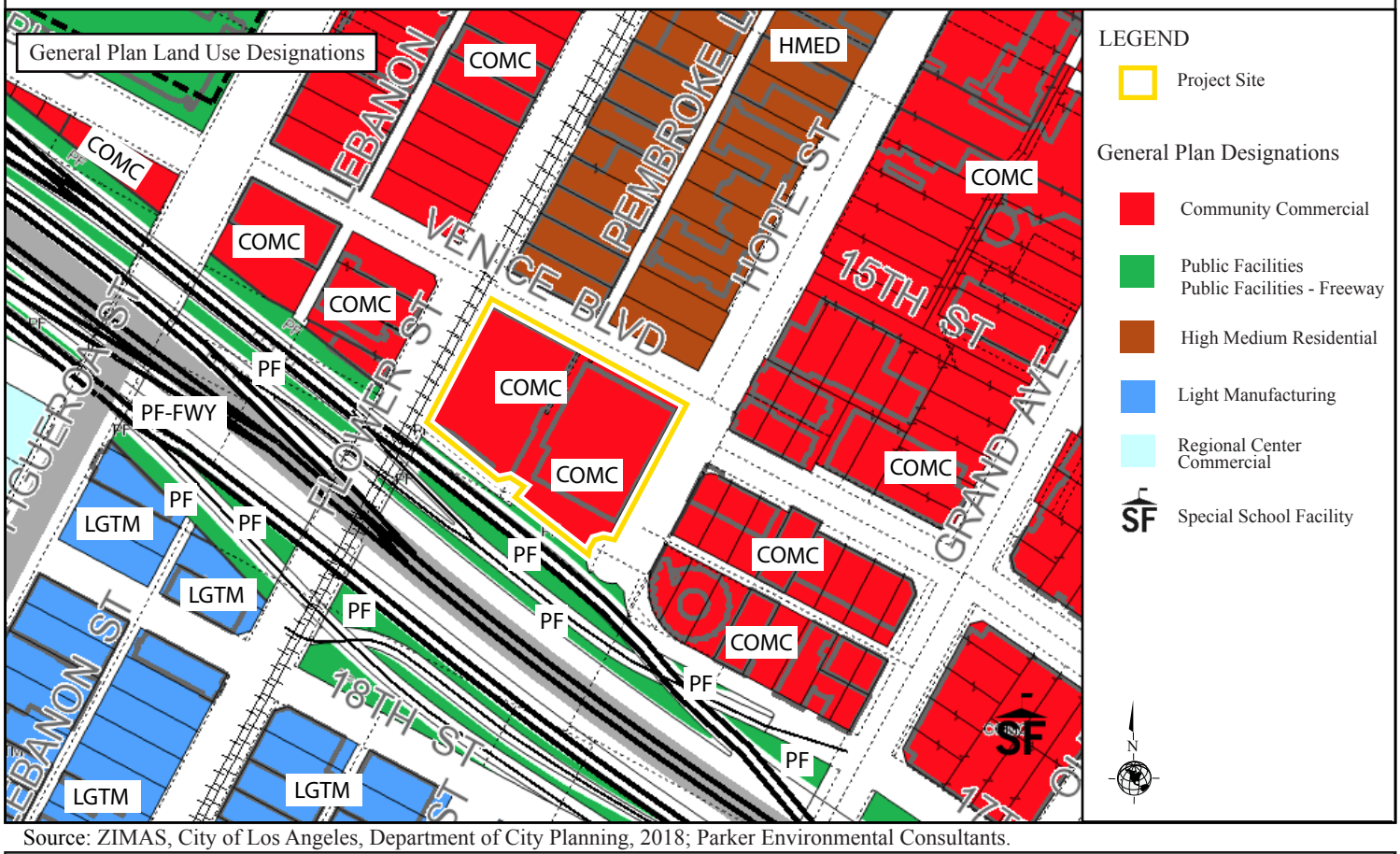
Figure 2.2, Zoning and General Plan Land Use Designations, shows the existing zoning and land use designation on the Project Site and the surrounding area. The Project Site is currently zoned C2-2D-O with a General Plan land use designation of Community Commercial.

The “D” Limitation contained within Ordinance No. 164,307, for the Project Site reads as follows:

> *The total floor area contained in all buildings on a lot shall not exceed three (3) times the buildable area of the lot, except for the following: (a) Projects approved under Section 418 (Transfer of Floor Area) of the Redevelopment Plan for the Central Business District Redevelopment Project; (b) Projects approved under Section 415 (Rehabilitation and/or Remodeling of Existing Buildings) or Section 416 (Replacement of Existing Buildings) of said Redevelopment Plan; (c) Projects for which a density variation of 50,000 square feet or less is granted under Section 437 of said Redevelopment Plan; (d) Projects for which a density variation of more than 50,000 square feet was granted under Section 437 of said Redevelopment Plan prior to the effective date of this ordinance; (e) Projects approved pursuant to any procedure to regulate transfers of floor area as may be adopted by the City Council. The term "floor area" shall mean floor area as defined in Municipal Code Sections 12.21.I-A.5 and 12.21.I-B.4.* (page 46 of Ordinance No. 164,307).

The Community Plan Land Use Map for the Central City Community Plan further states that the “D” limitation, “Corresponds with Height District No. 2-D for commercial, industrial and public facilities zones; D limitation to 3:1 FAR, except for transfer of floor area up to 6:1 FAR.” (See Footnote 2 on the Community Plan Land Use Map).





Source: ZIMAS, City of Los Angeles, Department of City Planning, 2018; Parker Environmental Consultants.

Figure 2.2
Zoning and General Plan Land Use Designations

Zones corresponding to the Community Commercial designation includes the CR, C2, C4, RAS3, and RAS4 zones. The Project Site is located within Height District 2. Height District No. 2 has no building height limit for the underlying zone but limits development to a floor area ratio (FAR) of 6:1. However, the "D" limitation limits FAR to a maximum of 3:1. As noted above, Footnote 2 of the Central City Community Plan permits a maximum 6:1 FAR on the Project Site through Transfer of Floor Area. The density, lot area and setback requirements for the Project Site are superseded by the Greater Downtown Housing Incentive Area (Ordinance 179,076, effective Sept. 2007). The "O" designation indicated that the Project Site is located in an oil-drilling district, specifically the Los Angeles Downtown Oil Field. Figure 2.2, Zoning and General Plan Designations, shows the existing zoning and land use designations on the Project Site and in the surrounding area.

The Project Site is located within the City Center Redevelopment Project area, Greater Downtown Housing Incentive Area, the Central City Transfer of Floor Area Rights (TFAR) Area, the Downtown Adaptive Reuse Incentive Area, a Freeway Adjacent Advisory Notice for Sensitive Uses area, a Metropolitan Transportation Authority (MTA) Project area, and the Enterprise Zone (the Employment and Economic Incentive Program Area). The design of development projects on the Project Site are further guided by the Downtown Design Guide.

a. Central City Community Plan

The Project Site is located within the Central City Community Plan (Community Plan) area of the City of Los Angeles. The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible. The Community Plan area contains a substantial amount of commercial development. More specifically, the Project Site is located in the South Park area, which is recognized to be a mixed-use community with a significant concentration of housing. This thriving residential community includes the proximate siting of auxiliary support services such as retail and commercial developments that provide employment opportunities for area residents.[1]

Downtown Los Angeles Community Plan Update (DTLA 2040)

The Los Angeles Department of City Planning is in the process of updating the Central City and Central City North Community Plans to create the Downtown Community Plan. The purpose of the Downtown Community Plan is to create and implement a vision of the future for Downtown Los Angeles and includes the following components:

[1] *City of Los Angeles, Central City Community Plan, accessed May 2018.*

(1) A boundary change to combine the two community plans into one community plan area, known as the Downtown Community Plan area;

(2) Amendments to the General Plan Land Use Map, referred to as the Downtown Community Plan General Land Use Map;

(3) A new Downtown Community Plan policy document;

(4) Amendments to the Framework Element and Mobility Plan 2035 for consistency with the new Downtown Community Plan;

(5) Zoning ordinances to implement the Downtown Community Plan:

a. Proposed New Zoning Code for the Downtown Community Plan Area;

b. Proposed Zone Changes to the City of Los Angeles Zoning Map;

c. Proposed Downtown Community Plan Implementation Overlay District;

d. Proposed Pipeline Parking Alignment Ordinance;

e. Proposed Community Plan Consolidation Ordinance;

f. Proposed removal of the Downtown Design Guide;

g. Proposed removal of the Bunker Hill Specific Plan,

h. Proposed amendments to the River Improvement Overlay (RIO);

i. Proposed Amendments to the Greater Downtown Housing Incentive Ordinance;

(6) Other Ordinances to implement a community benefit program in the CPIO:

a. Proposed Downtown Community Benefits Fee Ordinance;

b. Proposed Downtown Community Benefits Trust Fund Ordinance;

c. Proposed Downtown Affordable Housing Trust Fund Ordinance;

At the September 23, 2021 City Planning Commission meeting, CPC recommended approval of the Downtown Community Plan and new Zoning Code. The City Council has not formally adopted the Downtown Community Plan and new Zoning Code. In the coming months City Planning will prepare and publish the Final Environmental Impact Report (EIR), the City Planning

Commission's Letter of Determination, and the Recommended Community Plan and Zoning Code to advance the Downtown Plan and new Zoning Code for final adoption.[2]

b. City Center Redevelopment Plan

The Project Site is located within the CRA/LA City Center Redevelopment Project area. The City Center Redevelopment Plan, effective May 15, 2002, is valid until May 15, 2032.[3] While Assembly Bill 1X-26 dissolved redevelopment agencies as of October 2011, the land use regulations of the City Center Redevelopment Plan remain in effect. Pursuant to Ordinance 183,325 (effective November 11, 2019), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the City.

Within the City Center Redevelopment Project Area, the Project Site is located within the South Park Development area. The Redevelopment Plan's objective for the South Park Development area is to achieve a mixed-use live/work community, consisting of a housing-commerce community featuring open space.[4] The City Center Redevelopment Plan restricts development on the Project Site to an allowable FAR of 3 times the buildable area of the site unless a TFAR Request is approved, in which case the maximum FAR is 6 times the buildable area of the Project Site.

c. High Priority Transit Area

The Project Site is designated as a "Transit Priority Area" as identified in the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[5] The Project Site is served by two nearby Metro Stations within a half-mile: the Pico Station which serves the Metro Blue Line and Metro Expo Line, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station which serves the Metro Blue Line and is located approximately 0.3 mile southeast of the Project Site. Both stations provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Additionally, the Project Site is also located within ½ mile of numerous bus routes and stops with peak commute service intervals of 15 minutes or less. As such, the Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

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

3 *City of Los Angeles Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, 2002.*

4 *Ibid.*

5 *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: http://zimas.lacity.org/, accessed May 2018. (see Appendix N).*

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

2.2 Existing Site Conditions

The Project Site is currently developed with approximately 89,510 square feet of commercial/retail and office spaces with surface and rooftop parking. Table 2.1, provides a summary of the existing building addresses, building size, and use information associated with each address. As summarized in Table 2.1, below, the existing land uses total approximately 89,510 square feet, including 87,731 square feet of retail space and 1,799 square feet of office space.

Figure 2.3, Aerial Photograph of the Project Site, shows an aerial view of the Project Site and identifies the location points for the site photographs and surrounding land use photographs shown in Figure 2.4, Photographs of the Project Site, and Figure 2.5, Photographs of the Surrounding Land Uses, respectively. The Project Site is currently improved with four commercial retail/office buildings as seen in Figure 2.4, Photographs of the Project Site – Views 1 through 6, below. Two one-story buildings are located on the western portion of the Project Site, and two two-story buildings are located on the eastern portion of the Project Site. Vehicular access to the Project Site is currently provided by two ingress/egress driveways: one along Flower Street and one along Hope Street. Vehicular access is also provided to the on-site private driveway that runs in a north-south direction through the middle of the Project Site.

Table 2.1
Summary of Project Site

Address	Building Size (Square Feet)	Use
1600-1601 S. Flower Street	15,300	Retail
1616 S. Flower Street	15,000	Retail
1601-1611 S. Hope Street	43,710	Retail / Office [a]
1617 S. Hope Street	15,500	Retail
1623 S. Hope Street	-	Surface Parking
Total	**89,510 sf**	

Notes:
Sf = Square feet
[a] The existing uses within this building are comprised of approximately 1,799 square feet (sf) of office space and 41,911 square feet of retail space.
Sources: http://zimas.lacity.org/,accessed February 2019; City of Los Angeles Department of Building and Safety, and O.K.O. Engineering, Inc., ALTA/ACSM Land Title Survey, November 1, 2012.

The Project Site does not contain any native vegetation or locally protected tree species.[6] There are five street trees on the public right-of-way on the west side of Hope Street and two street trees on the public right-of-way on the south side of Venice Boulevard, adjacent to the Project Site that will be removed and replaced.[7]

[6] *Source: The Tree Resource, Protected Tree Report, Property at 1600 S. Flower St. & 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018 (See Appendix I).*

[7] *Ibid.*



Source: Google Earth, Aerial View, 2018; Parker Environmental Consultants.

Figure 2.3
Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: From the north side of Venice Boulevard, looking southwest at the Project Site.



View 2: From the east side of Hope Street, looking southwest at the Project Site.



View 3: From the east side of Hope Street, looking west at the southern boundary of the Project Site.



View 4: From the northwest corner of the intersection of Venice Boulevard and Flower Street, looking east at the Project Site.



View 5: From the northwest corner of the the intersection of Venice Boulevard and Flower Street, looking south at the Project Site.



View 6: On the west side of Flower Street, looking south at the southern boundary of the Project Site.

Source: Parker Environmental Consultants, September 10, 2018.

Figure 2.4
Photographs of the Project Site
Views 1-6



View 7: From the south side of Venice Boulevard, looking northwest at the commercial properties to the north of the Project Site.



View 8: From the south side of Venice Boulevard, looking northeast at the properties to the north of the Project Site.



View 9: From the west side of Hope Street, looking northeast at the properties to the east of the Project Site.



View 10: From the east side of Hope Street, looking southwest at the freeway bordering the Project Site to the south.



View 11: From the northeast corner of Venice Boulevard and Flower Street, looking at the property to the west of the Project Site.



View 12: From the southwest corner of Venice Boulevard and Flower Street, looking at the property to the north of the Project Site.

Source: Parker Environmental Consultants, September 10, 2018.

Figure 2.5
Photographs of Surrounding Land Uses
Views 7-12

C. Description of Project

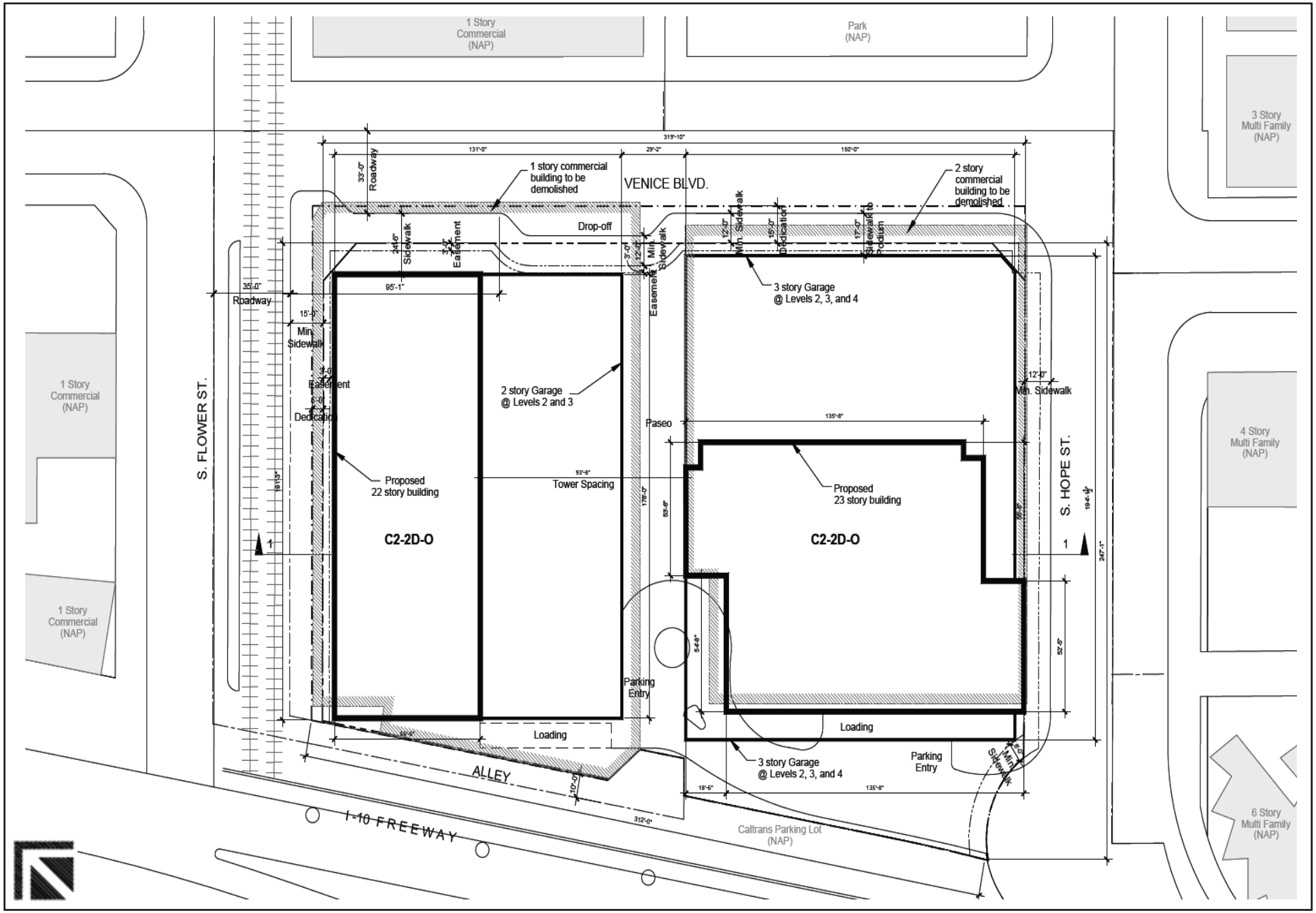
1. Project Overview

The Project includes the demolition of the existing structures and the construction, use, and maintenance of a mixed-use development with a 22-story hotel building with 300 rooms and 3,120 square feet of retail and a 23-story mixed-use residential and commercial building with 250 residential dwelling units and 10,000 square feet of ground floor commercial/retail/restaurant space. A pedestrian paseo would be located between these two buildings. There are a total of seven existing street trees in the public right-of-way adjacent to the property along Hope Street and Venice Boulevard, which would be removed during construction. A summary of the Project is provided in Table 2.2, Proposed Development Program, below. The plan layout of the Project is depicted in Figure 2.6, Proposed Plot Plan. Figure 2.7 through Figure 2.9 illustrate the basement level, ground level, and podium level floor plans.

Table 2.2
Proposed Development Program

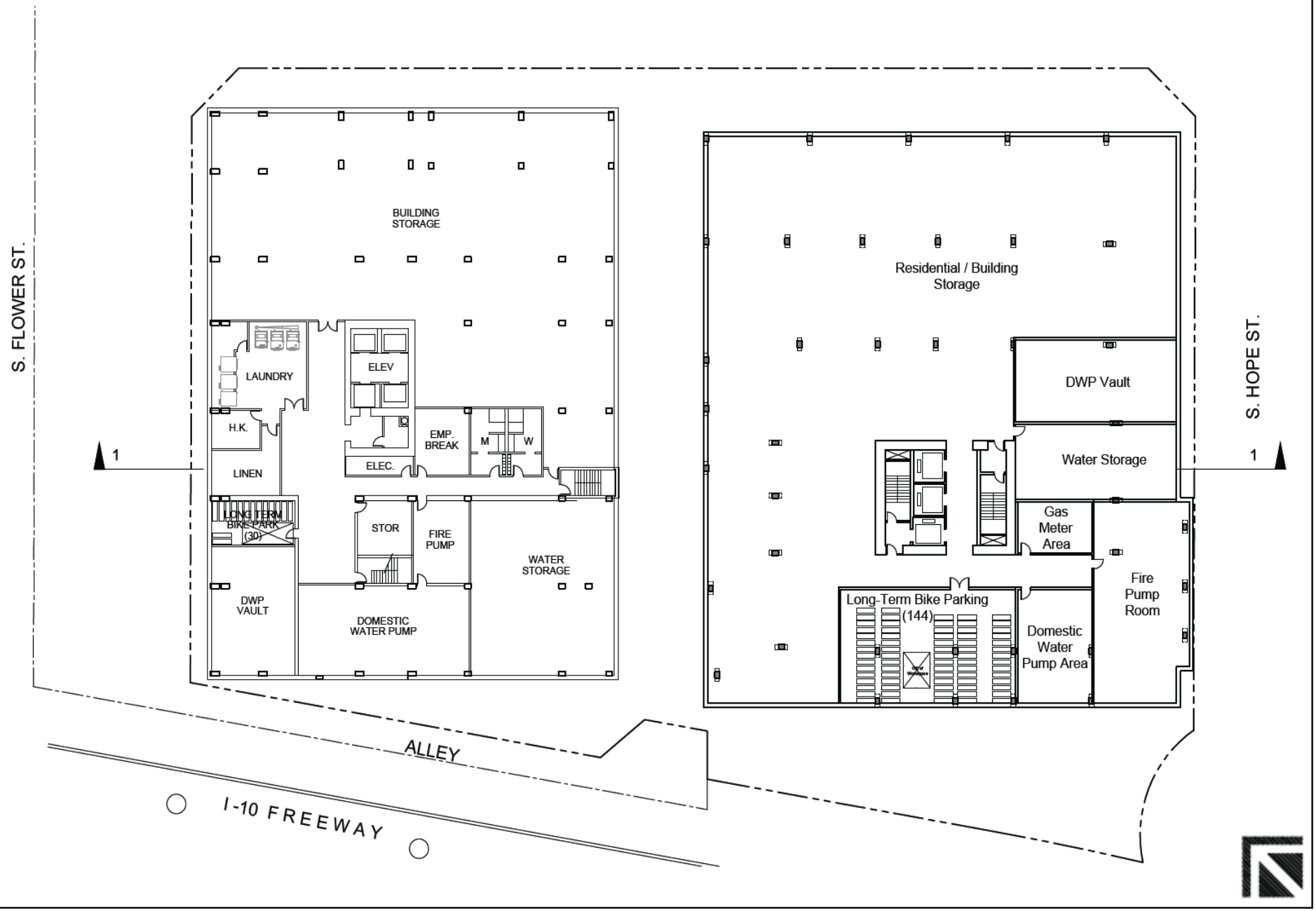
Land Uses	Proposed Guest Room / Dwelling Units	Proposed Floor Area (Square Feet)
Hotel Building (Tower 1)		
Guest Rooms	300	198,000
Commercial/Restaurant	--	3,120
Subtotal Hotel	***300***	***201,120***
Mixed-Use Residential Building (Tower 2)		
Studio	75	*241,510* [a]
1-Bedroom	104	
2-Bedroom	68	
3-Bedroom	3	
Commercial/Medical Office	--	10,000
Subtotal Mixed-Use Residential	***250***	***251,510***
TOTAL FLOOR AREA		**452,630 sf**

[a] *Includes amenity space and common circulation areas.*
Source: Togawa Smith Martin Architects, June 11, 2018.



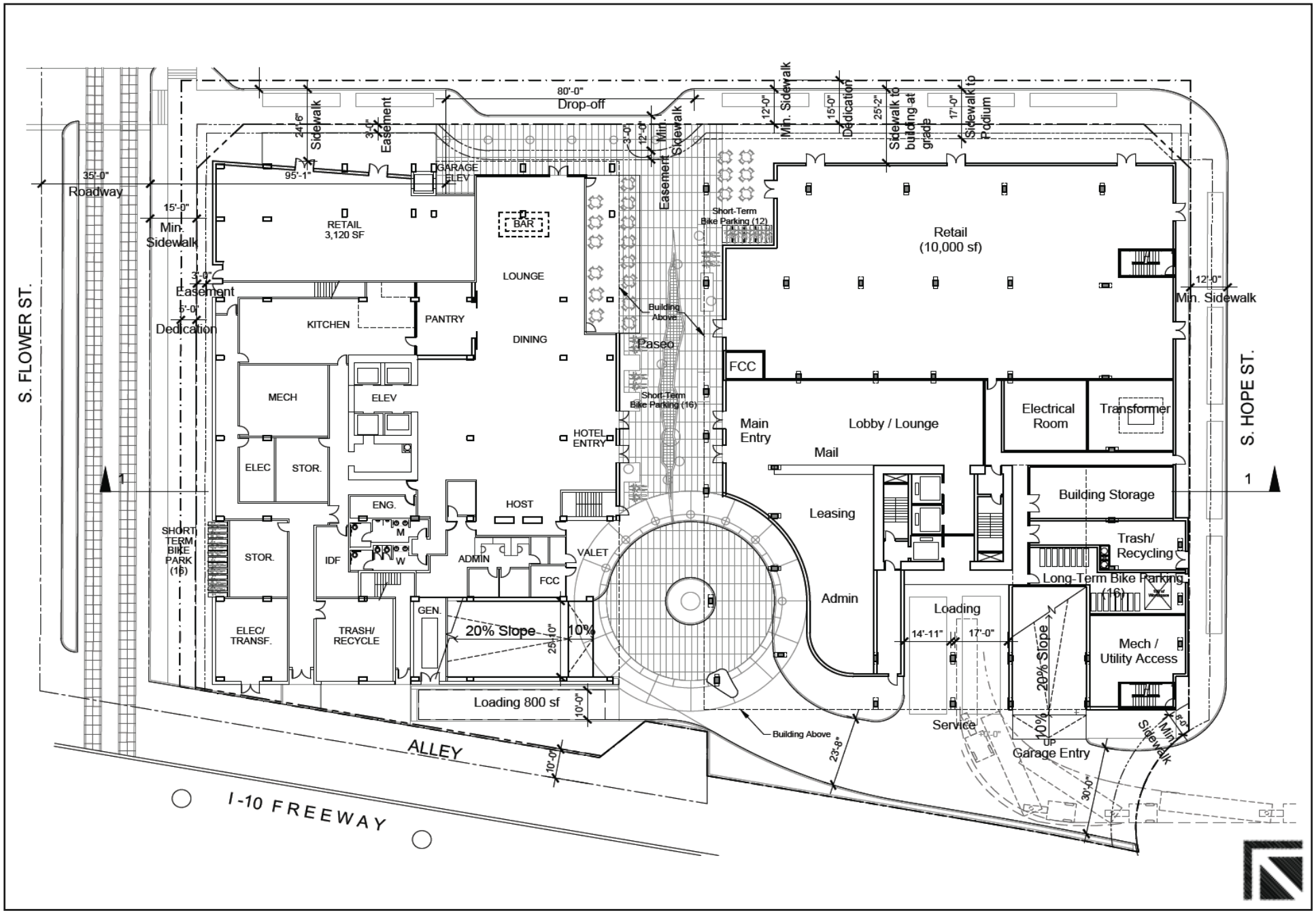
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.6
Proposed Plot Plan



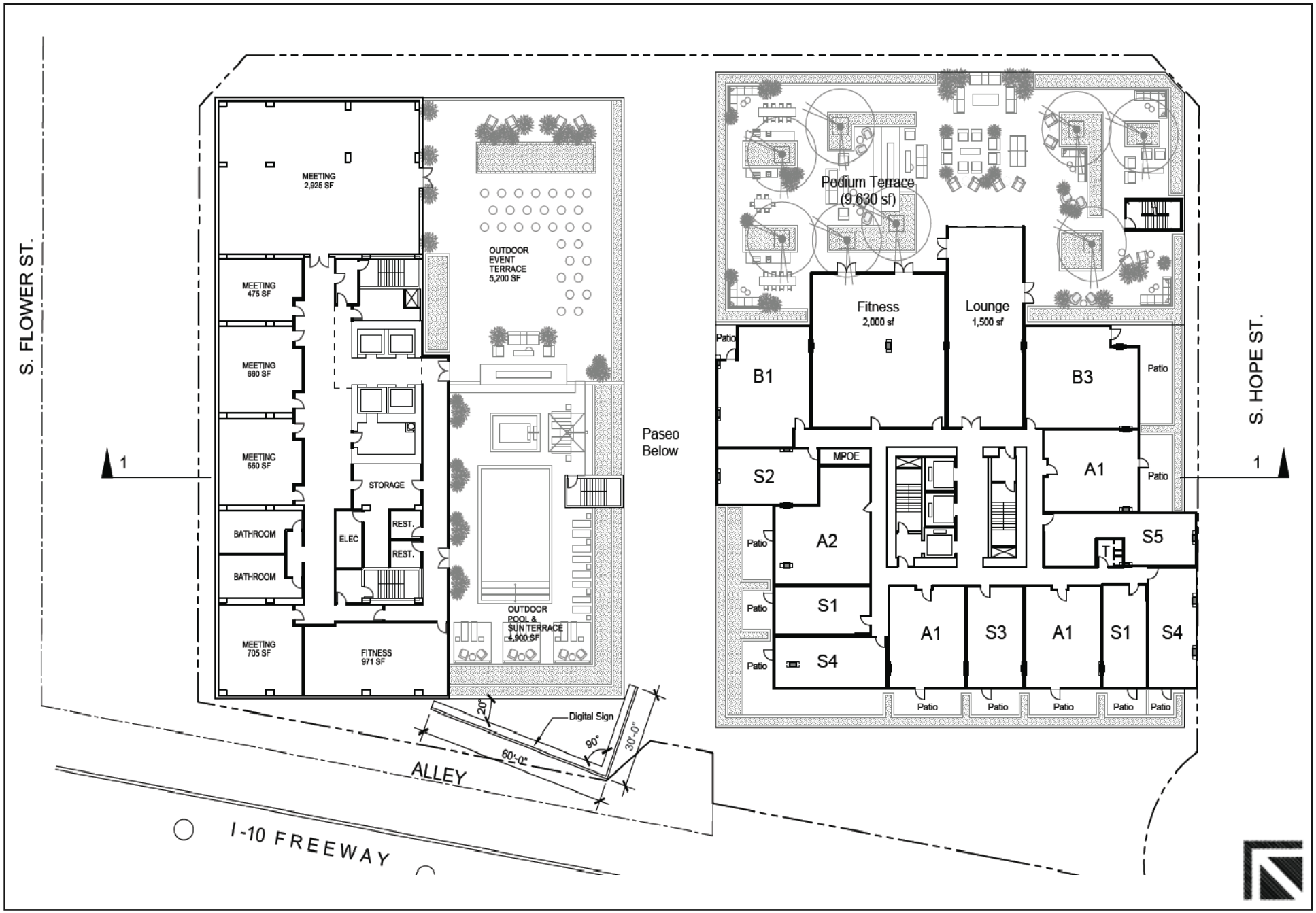
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.7
Basement Level Plan



Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.8
Ground Level Plan



Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.9
Podium Level Plan (Level 5)

Residential Tower

The mixed-use residential building would be located on the eastern half of the Project Site, adjacent to Hope Street. The residential tower would include a maximum of 250 residential units with approximately 241,510 square feet of residential floor area. The mixed-use residential building would provide a basement, lobby and medical office space on the ground level, parking on levels two through four, a 5th floor amenity deck, and 19 levels of residential units, and a roof terrace/amenity deck. The unit mix includes 75 studios, 104 one-bedroom units, 68 two-bedroom units, and 3 three-bedroom (penthouse) units. The dwelling units would be located on Level 5 through Level 23. Figure 2.10, Building Section, shows the locations of the residential units within the floor levels.

The mixed-use residential building would include a residential lobby located on the ground floor along the proposed paseo providing access to residents and visitors. Approximately 10,000 square feet of restaurant floor area would be located on the ground floor of the mixed-use residential building fronting Venice Boulevard. Additional residential amenity space would be located on the 5th floor (podium terrace), 9th floor (elevated terrace), and on the 23rd floor (roof terrace). Private open space would also be provided on private balconies. Figure 2.10 shows the locations of the outdoor terrace and amenities within the associated floor levels.

Hotel Tower

The hotel building would be located adjacent to Flower Street on the western half of the Project Site. The hotel tower would include 300 guest rooms with approximately 198,000 square feet of hotel floor area. The Project's hotel building would include a basement, a ground-floor lobby, ground floor commercial space, two levels of above-grade parking on levels two through three, a 5th level amenity deck,[8] and 15 levels of hotel rooms. The hotel rooms would be located on Level 6 through Level 22. Figure 2.10, Building Section, shows the locations of the hotel rooms within the floor levels. The hotel building would include a hotel lobby located on the ground floor with pedestrian entrance from the provided paseo. Approximately 3,120 square feet of restaurant space would be located on the ground floor of the hotel building fronting Venice Boulevard. Additional hotel amenity space would be located on the 5th floor (amenity deck) and 9th floor (elevated terrace). Such amenities include an outdoor event space, outdoor pool and sun terrace, a conference room, meeting room, and fitness room, which are illustrated in Figure 2.9, Podium Level Plan.

Commercial Uses

The Project would include a combined total of approximately 13,120 square feet of commercial and retail space. Approximately 10,000 square feet of medical office space would be located on the ground floor of the mixed-use residential building fronting Venice Boulevard and Hope Street,

[8] *The hotel does not contain a 4th level – it is open to the 3rd level below.*

and 3,120 square feet of restaurant space would be located on the ground floor of the hotel building fronting Venice Boulevard. The locations of the commercial spaces are illustrated in Figure 2.8, Ground Level Plan.

2. Floor Area / Density

The Project Site includes approximately 75,503 square feet of gross lot area. The Redevelopment Plan and 'D' limitation limit the total floor area of the Site to a ratio of 3:1 or approximately 226,509 square feet based on lot area. As previously discussed under subheading B.2.1, Zoning and Land Use Designations, above, the Community Plan, Redevelopment Plan and TFAR, development of the Project Site is allowed to a maximum FAR of 6:1, resulting in an allowable floor area potential of 453,018 square feet. The Project would provide approximately 452,630 square feet of floor area for an approximate 6:1 FAR. The Applicant is seeking a TFAR for greater than 50,000 square feet of floor area for the transfer of 226,121 square feet of floor area.

3. Building Height

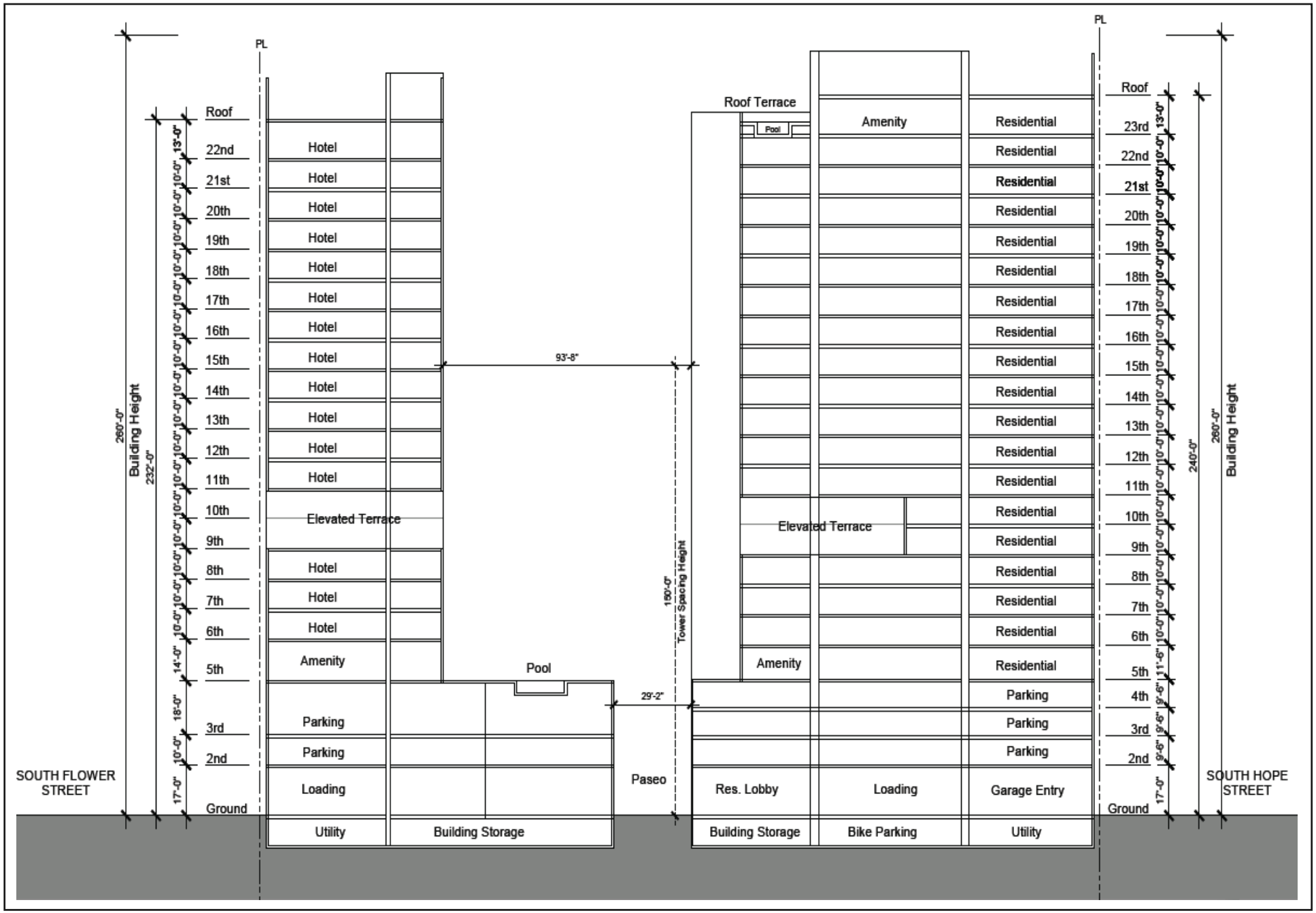
The Project proposes a 22-story hotel building and 23-story mixed-use residential building with multiple elevations and step-backs. Both buildings are planned for a maximum roof height of approximately 260 feet above grade.

The Project's building sections are detailed in Figure 2.10, Building Section. Figure 2.11 through Figure 2.16 depict the Project's building elevations.

4. Setbacks and Dedications

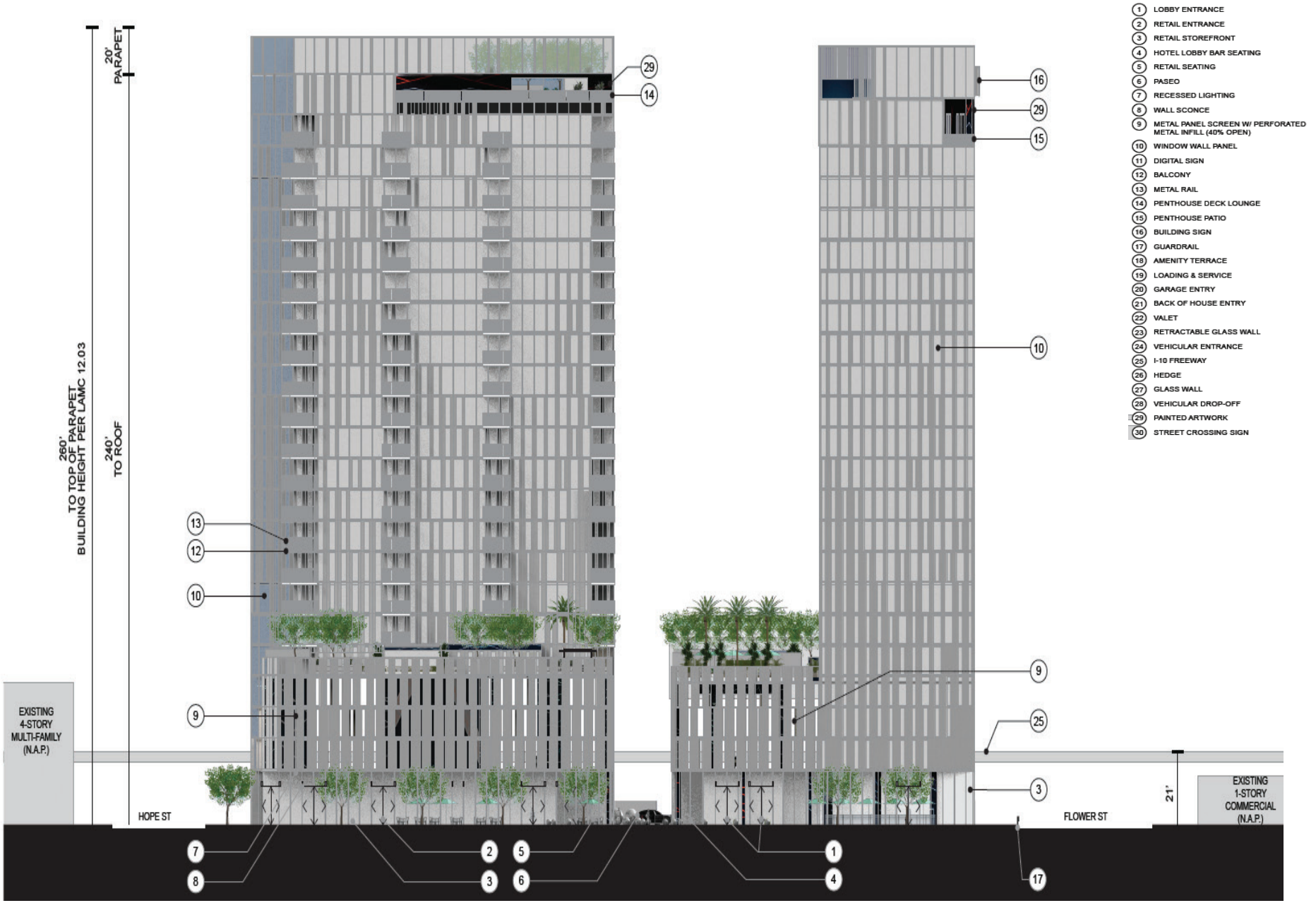
The Project Site has frontage along Flower Street and the Metro A Line and E Line right-of-way to the west, Venice Boulevard to the north, Hope Street to the east and the I-10 freeway and an unnamed alley to the south. The Project proposes a sidewalk with a 15-foot minimum width on the western boundary fronting the Metro E Line and A Line right-of-way (running parallel with Flower Street), that includes a 5-foot dedication and a 3-foot easement. The Project also includes a 24 ½-foot sidewalk fronting Venice Boulevard along the northern property line.

Venice Boulevard is designated as a Modified Avenue II in the City's Mobility Plan. Along the northerly frontage along Venice Boulevard, the Project would provide an average 24-foot, 6-inch sidewalk fronting the hotel tower on the west side of the site and a minimum 12-foot sidewalk on the east portion of the Project Site, that includes a 3-foot easement and 15-foot dedication. An 80-foot linear drop off zone along Venice Boulevard is proposed to allow for passenger loading and unloading. The Applicant requests Advisory Agency approval to permit a waiver of improvement to the sidewalk width standard for a portion of Venice Boulevard to accommodate a passenger drop-off area.



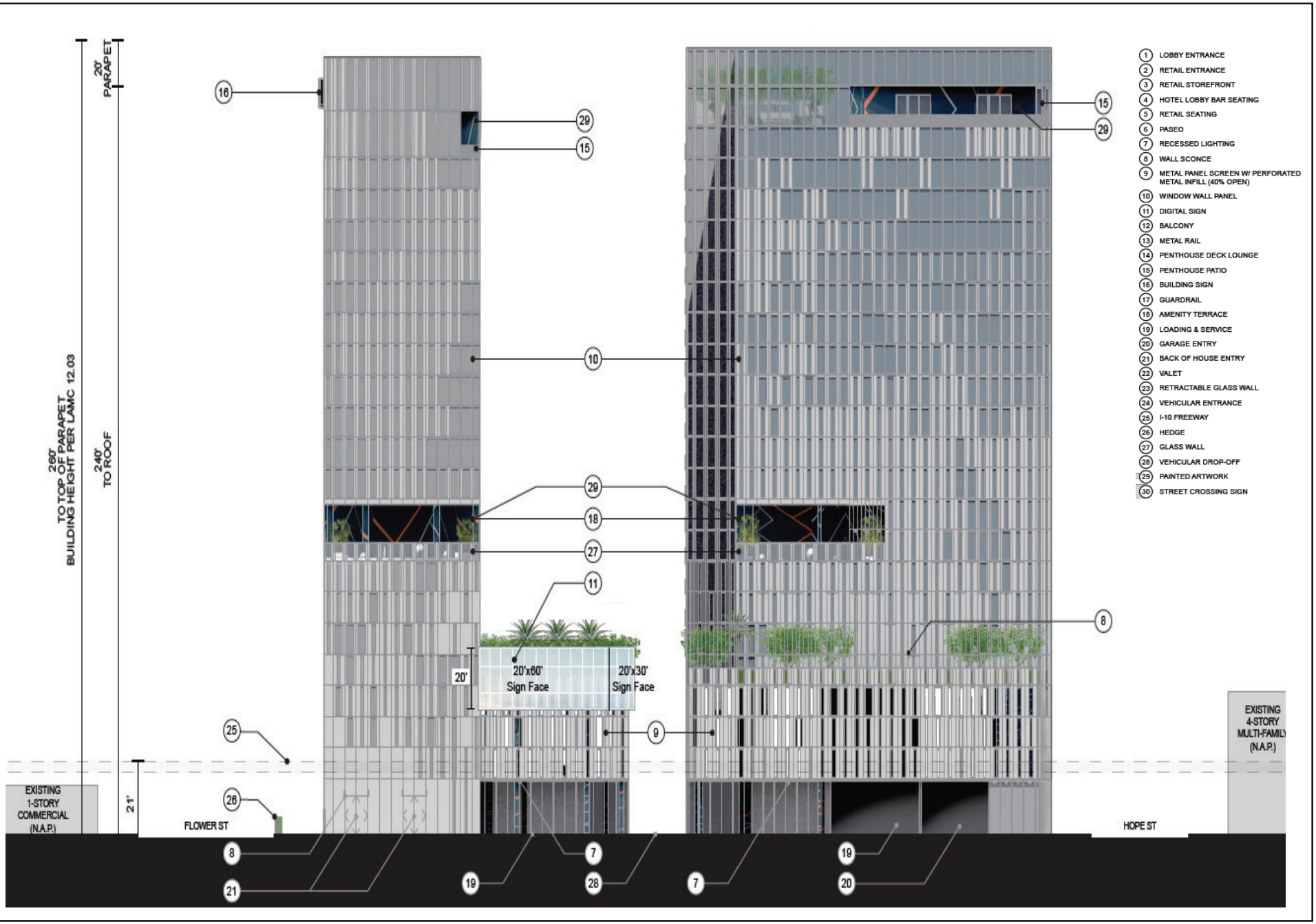
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.10
Building Section



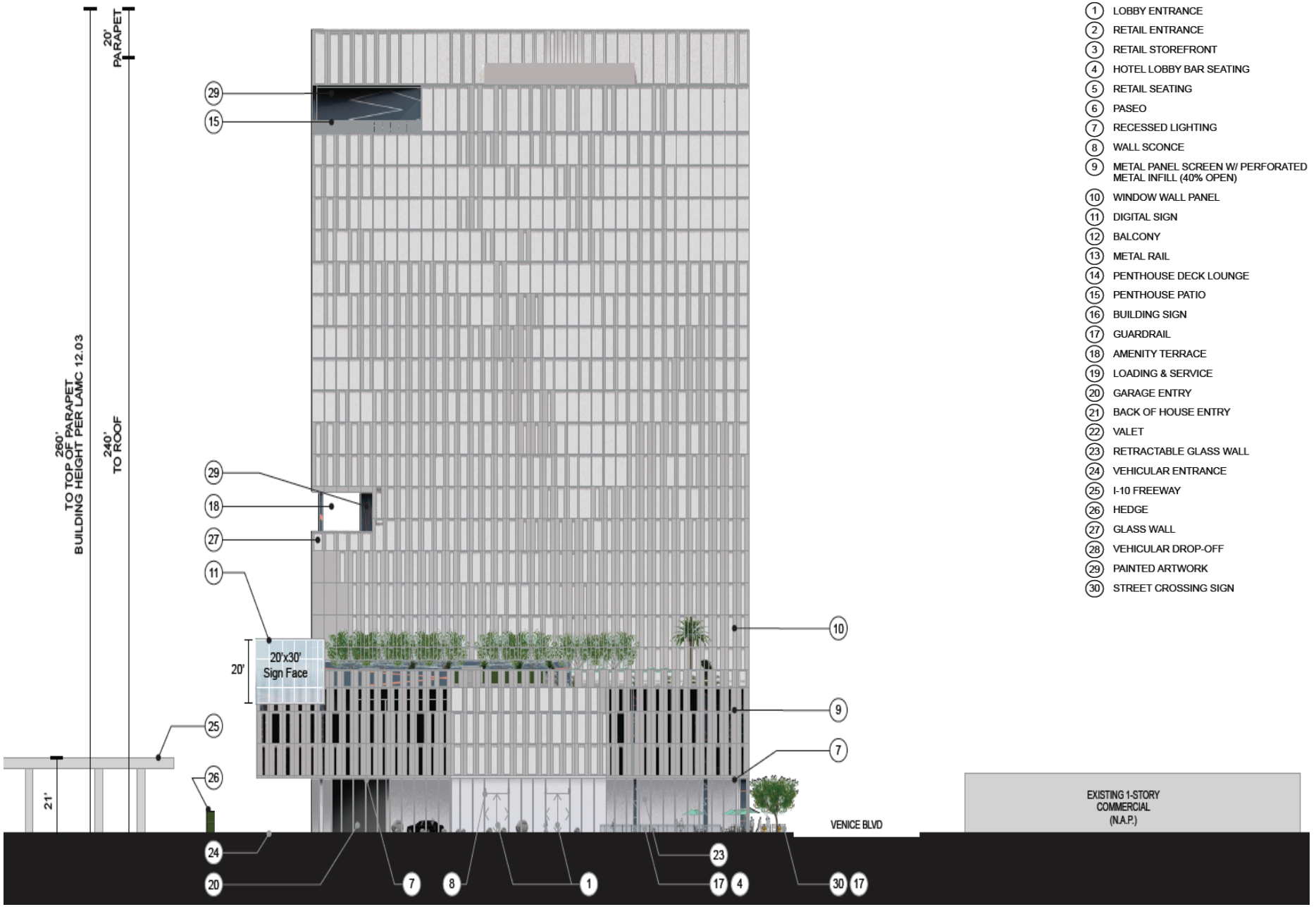
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.11
North Elevation



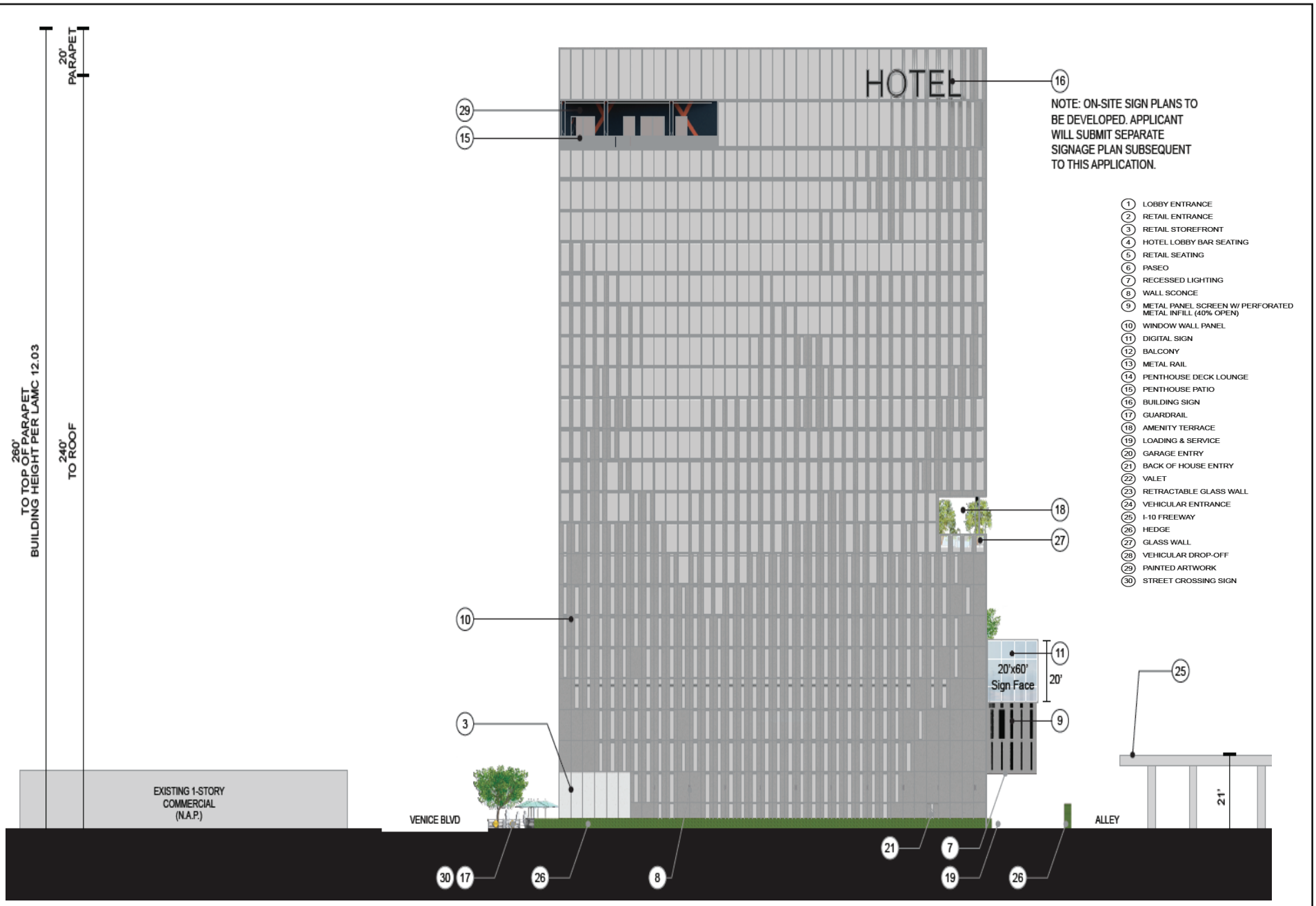
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.12
South Elevation



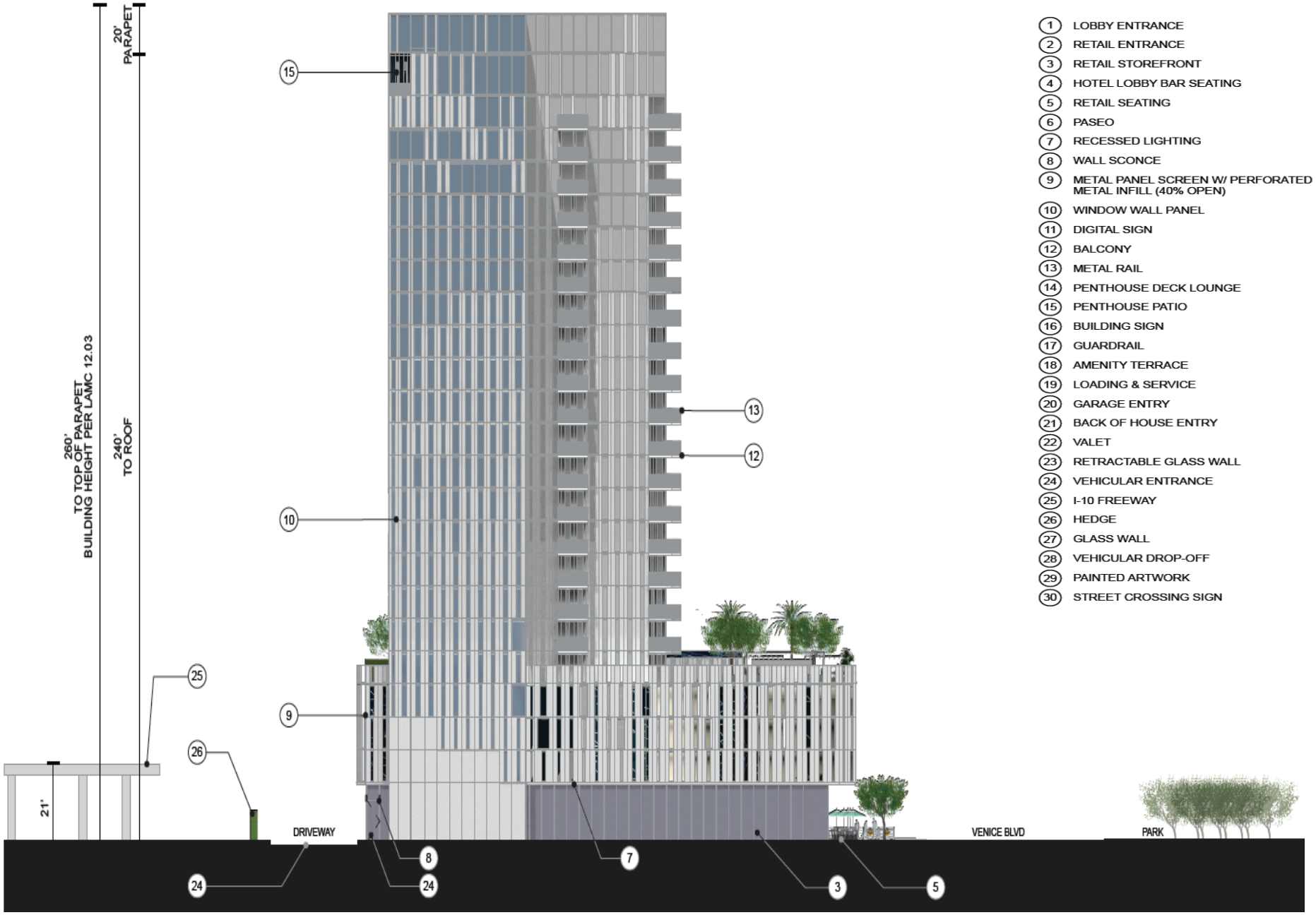
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.13
East Elevation - West Tower



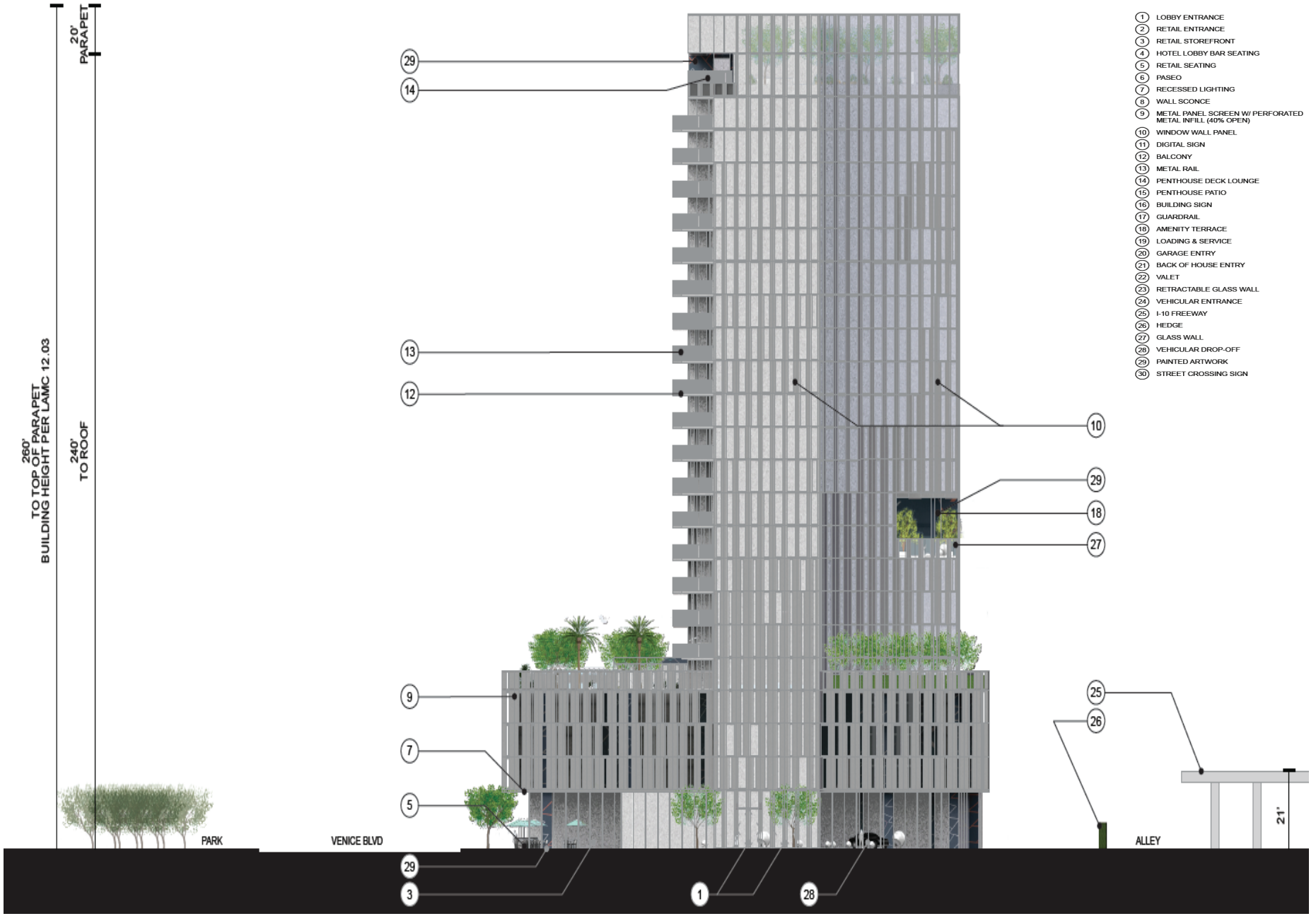
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.14
West Elevation - West Tower



Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.15
East Elevation - East Tower



Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.16
West Elevation - East Tower

Hope Street is designated as a Collector Street south of Venice Boulevard and an Avenue II roadway north of Venice Boulevard. Fronting Hope Street, the building would have a zero-foot setback with a 12-foot minimum sidewalk.

5. Design and Architecture

Exterior building materials/features include retractable glass walls, metal panel screens, digital signs, metal rails, and painted artwork – all to create a contemporary architectural expression. Illustrations depicting the scale and massing of the proposed structures are depicted in Figure 2.11 through Figure 2.19, Conceptual Renderings.

6. Open Space and Landscaping

The open space requirements and amount of open space proposed for the residential uses of the Project are summarized in Table 2.3, Summary of Required and Proposed Open Space Areas, below. The Project is requesting a Director's Determination to allow a 10 percent reduction in required open space, resulting in 24,233 square feet of required open space. The Project Site would provide 25,768 square feet of open space throughout the ground-floor lobby area, Level 5 podium and amenity area, 9th floor elevated terrace, the roof terrace, and in private residential balconies.

Table 2.3
Summary of Required and Proposed Open Space Areas

LAMC Open Space Requirements [a]	**Dwelling Units**	**Required Open Space (sf)**
Less than 3 Habitable Rooms (100 sf/du) [b]	179	17,900
3 Habitable Rooms (125 sf/du) [c]	68	8,500
More than 3 Habitable Rooms (175 sf/du) [d]	3	525
Subtotal:		**26,925 sf**
10% Reduction: [e]		***- 2,692***
NET TOTAL:		**24,233**
Proposed Open Space Area	**Proposed Open Space (square feet)**	
Outdoor Common Space	14,660	
Indoor Common Space	6,058	
Balconies [f]	5,050	
TOTAL:	**25,768 sf**	

Notes: du = dwelling unit; sf = square feet
[a] *LAMC Section 12.21 G.2*
[b] *Includes studio units and one-bedroom units.*
[c] *Includes 2-bedroom units.*
[d] *Includes 3-bedroom units.*
[e] *The Project is requesting a Director's Determination for 10% reduction in required open space.*
[f] *101 units will have a 50 sf private balcony.*
Source: Togawa Smith Martin Architects; LRM Landscape Architecture, July 23, 2019.

The Project would provide 5,180 square feet of landscaped open space area and 63 trees on-site. Illustrations depicting the landscape floor plans are in Figure 2.20 through Figure 2.23.



VENICE BLVD EYE-LEVEL LOOKING SOUTH



1-10 FREEWAY CAR-LEVEL LOOKING NORTH

Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.17
Conceptual Renderings 1



ROOFTOP AERIAL



EYE-LEVEL PASEO LOOKING SOUTH

Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.18
Conceptual Renderings 2



1-10 FREEWAY CAR-LEVEL LOOKING EAST



1-10 FREEWAY CAR-LEVEL LOOKING WEST

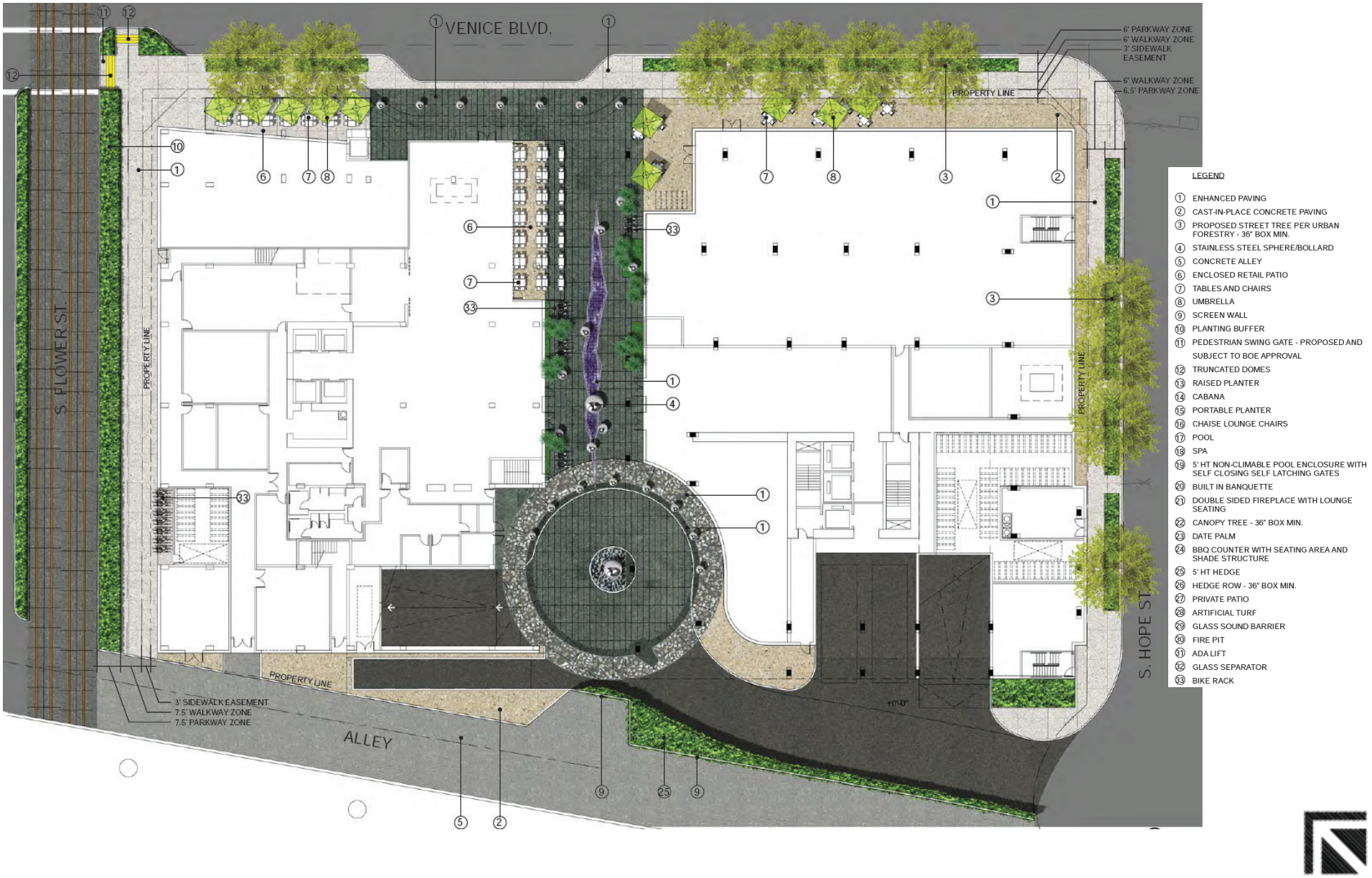
Source: Togawa Smith Martin Architects, June 11, 2018.

Figure 2.19
Conceptual Renderings 3



Source: Togawa Smith Martin Architects; LRM Landscape Architecture, July 23, 2019.

Figure 2.20
Landscape Composite Plan



Source: Togawa Smith Martin Architects; LRM Landscape Architecture, July 23, 2019.

Figure 2.21
Landscape Plan - Ground Level Plan



Source: Togawa Smith Martin Architects; LRM Landscape Architecture, July 23, 2019.

Figure 2.22
Landscape Plan - Podium Level Plan (Level 5)



9th & 10th LEVEL PLAN



ROOF LEVEL PLAN

LEGEND

1. ENHANCED PAVING
2. CAST-IN-PLACE CONCRETE PAVING
3. PROPOSED STREET TREE PER URBAN FORESTRY - 36" BOX MIN.
4. STAINLESS STEEL SPHERE/BOLLARD
5. CONCRETE ALLEY
6. ENCLOSED RETAIL PATIO
7. TABLES AND CHAIRS
8. UMBRELLA
9. SCREEN WALL
10. PLANTING BUFFER
11. PEDESTRIAN SWING GATE - PROPOSED AND SUBJECT TO BOE APPROVAL
12. TRUNCATED DOMES
13. RAISED PLANTER
14. CABANA
15. PORTABLE PLANTER
16. CHAISE LOUNGE CHAIRS
17. POOL
18. SPA
19. 5' HT NON-CLIMABLE POOL ENCLOSURE WITH SELF CLOSING SELF LATCHING GATES
20. BUILT IN BANQUETTE
21. DOUBLE SIDED FIREPLACE WITH LOUNGE SEATING
22. CANOPY TREE - 36" BOX MIN.
23. DATE PALM
24. BBQ COUNTER WITH SEATING AREA AND SHADE STRUCTURE
25. 5' HT HEDGE
26. HEDGE ROW - 36" BOX MIN.
27. PRIVATE PATIO
28. ARTIFICIAL TURF
29. GLASS SOUND BARRIER
30. FIRE PIT
31. ADA LIFT
32. GLASS SEPARATOR
33. BIKE RACK

Source: Togawa Smith Martin Architects; LRM Landscape Architecture, July 23, 2019.

Figure 2.23
Landscape Plan - 9th, 10th, and Roof Level Plan

7. Sustainability and Energy Conservation Features

The Project would be designed with four central cooling towers, with two located on the roof level of each tower. The Project would comply with the 2022 California Green Building Standards, the City of Los Angeles Green Building Code, and that at least five percent of all parking spaces on-site shall include electric vehicle (EV) charging stations.

8. Access, Circulation, and Parking

Parking for the proposed uses on-site would be provided in the second level through third level above grade in the hotel building and in the second level through fourth level above grade in the mixed-use residential building. Vehicular access to the on-site parking garages and loading service areas would be provided via one primary driveway on Hope Street at the southern end of the Project Site. This driveway would provide access to both buildings. A roundabout would be located to the south of the paseo, where a valet drop-off service would also be located. A loading/service area for the hotel building would be located at the southeast corner of the hotel building and would be accessible via the entry driveway on S. Hope Street and via the southerly alley connecting to Flower Street. Access for trucks to service the electrical supply and trash pick-up would also be provided via the southerly alley connecting to Flower Street. The loading/service area for the residential building would be located on the south side of the residential building adjacent to the garage entry at Hope Street. Additionally, there would be a proposed 80 foot-long drop off zone on Venice Boulevard, midblock between Flower and Hope Streets. The parking levels are depicted in Figure 2.10, Building Section.

Vehicle Parking

As summarized in Table 2.4, Summary of Required and Proposed Vehicle Parking Spaces, below, the Project would provide a total of 288 parking spaces, which includes: 228 residential spaces, 41 hotel parking spaces, and 19 commercial spaces.

Table 2.4
Summary of Required and Proposed Vehicle Parking Spaces

Description	Quantity	Parking Required		Parking Provided
		Rate	Spaces	
Residential				
Units with 3 or less Habitable Rooms	179 du	1 per du [a]	179	186
Units with more than 3 Habitable Rooms	71du	1.25 per du [a]	89	42
		Subtotal Residential Required	***268***	
		Bicycle Reduction (15%)	*-40*	
		Subtotal Residential	***228***	***228***
Hotel [b]				
1 – 20 Guest Rooms	20 guest rooms	1 per 2 guest room	10	27
21 – 60 Guest Rooms	40 guest rooms	1 per 4 guest rooms	10	14
> 60 Guest Rooms	240 guest rooms	1 per 6 guest rooms	40	
		Subtotal Hotel Required	***60***	
		Bicycle Reduction (15%)	*-9*	
		Additional Bicycle Reduction (20%) [c]	*-10*	
		Subtotal Hotel	***41***	***41***
Commercial				
Ground Floor Commercial	13,120 sf	2 per 1,000 sf [d]	**27**	19
		Bicycle Reduction (30%)	*-8*	
		Subtotal Commercial	***19***	***19***
		TOTAL	**288**	**288**

Notes:
du = dwelling unit, sf = square feet
[a] *For Residential Use: Parking requirements as calculated by the Central City Parking District (CCPD) exceptions to the rates presented in Los Angeles Municipal Code (LAMC) Section 12.21 A 4 (p), City of Los Angeles, revised July 24, 2013.*
[b] *For Hotel Use: LAMC Section 12.21 4(p)(2), Exception for Central City Parking District.*
[c] *The Applicant is requesting an additional 20% reduction in required hotel parking spaces, pursuant to LAMC Section 12.24 S.*
[d] *For Commercial Use: Developments within the State Enterprise Zoning District required to provide 2 parking space for every 1,000 sf of commercial uses. (LAMC Section 12.21 A4(x)(3).*
Source: Togawa Smith Martin Architects, June 11, 2018.

Bicycle Parking

The Project provides on-site bicycle parking for short-term and long-term bike storage. As summarized in Table 2.5, below, the Project would provide a total of 252 short- and long-term spaces on-site, which exceeds the required 224 spaces. In the event the number of dwelling units is reduced from the current plans, the amount of vehicle and bicycle parking would be revised accordingly to meet the code requirements.

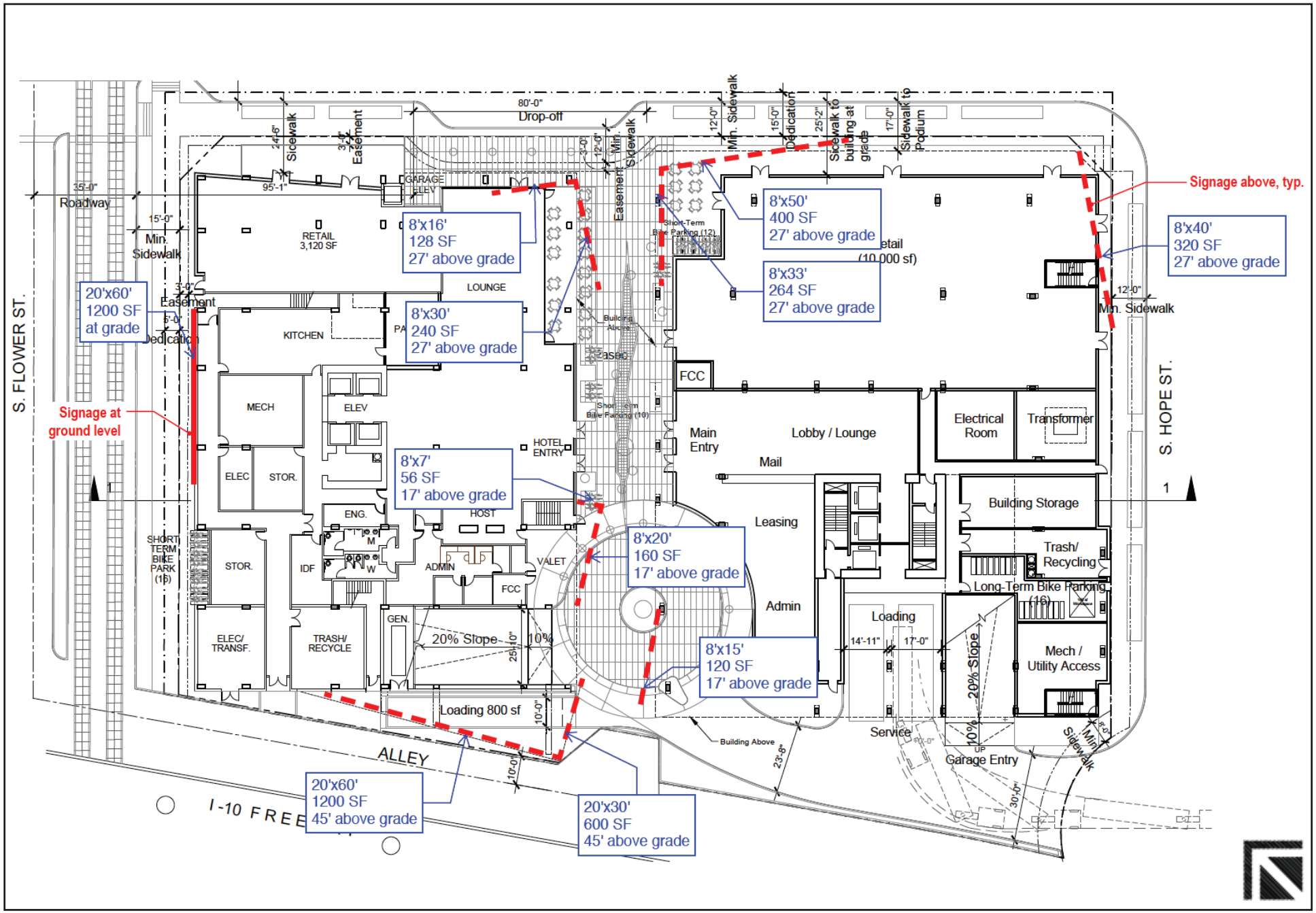
Table 2.5
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Parking Required [a]		Total Spaces Required	Total Spaces Provided
		Short Term	Long Term		
Residential [b,c]					
Units 1-25	25 du	2	25	27	
Units 26-100	75 du	5	50	55	
Units 101-200	100 du	5	50	55	
Units 201-250	50 du	1	12	13	
			Subtotal Residential:	150	160
Hotel [d]					
Guest Rooms	300 rooms	30	30	60	60
Commercial [e]					
Commercial/Retail	13,120 sf	7	7	14	32
TOTAL		**50**	**174**	**224**	**252**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21 A.16. Bicycle Parking and Shower Facilities, revised May 9, 2018.*
[b] *Short-term bicycle rates for residential uses are as follows: 1 space per 10 units for first 25 units; 1 space per 15 units for units 26-100; 1 space per 20 units for units 101-200; and 1 space per 40 units for every unit over 200.*
[c] *Long-term bicycle rates for residential units are as follows: 1 space per unit for first 25 units; 1 space per 1.5 units for units 26-100; 1 space per 2 units for units 101-200; and 1 space per 4 units for every unit over 200.*
[d] *All hotels shall provide both short- and long-term bicycle parking at a rate of one space per 10 guest rooms.*
[e] *Commercial uses including retail shall provide both short- and long-term parking at a rate of one space per 2,000 sf.*
Source: Togawa Smith Martin Architects, June 11, 2018.

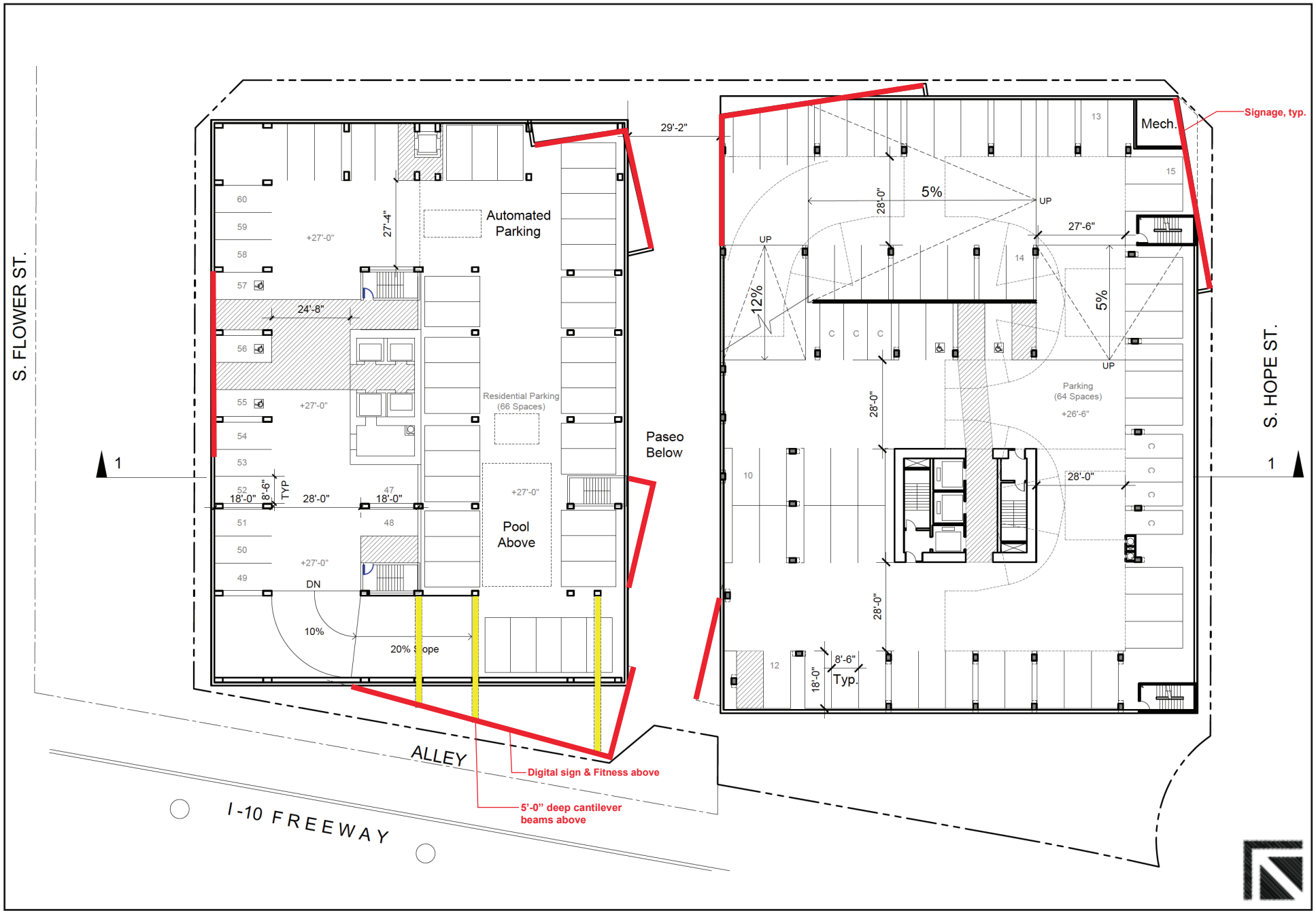
9. Signage Program

The Project includes a request for a Supplemental Use District (SUD) to establish a sign district to permit a variety of sign dimensions that would consist of digital signs and off-site advertising. The proposed signage program includes a comprehensive set of development standards and guidelines related to signage and illumination as it relates to the unified development program. The proposed sign district would incorporate the entire block bounded by Flower Street, Venice Boulevard, Hope Street, and the southern alleyway. As shown in Table 2.6, Proposed Signage Program Sign Area Totals, there would be a total of 11 signs on 7 sign structures with a total area of 4,688 square feet. The locations of the proposed signage program on each floor level are shown on Figure 2.24 through Figure 2.27. The locations of the proposed signs on the buildings' facades are illustrated in Figure 2.28 through Figure 2.30.



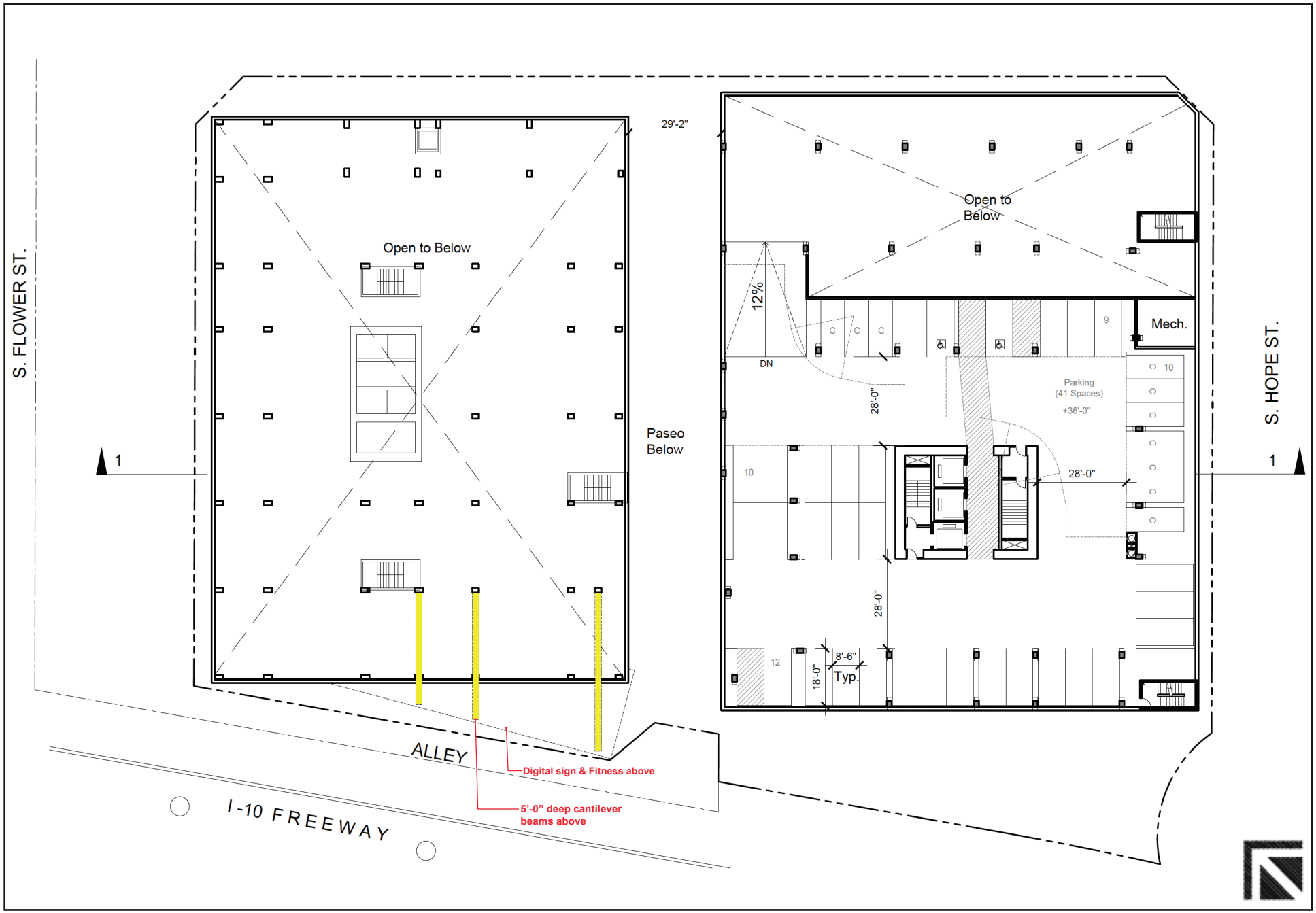
Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.24
Proposed Signage Program - Ground Level Plan



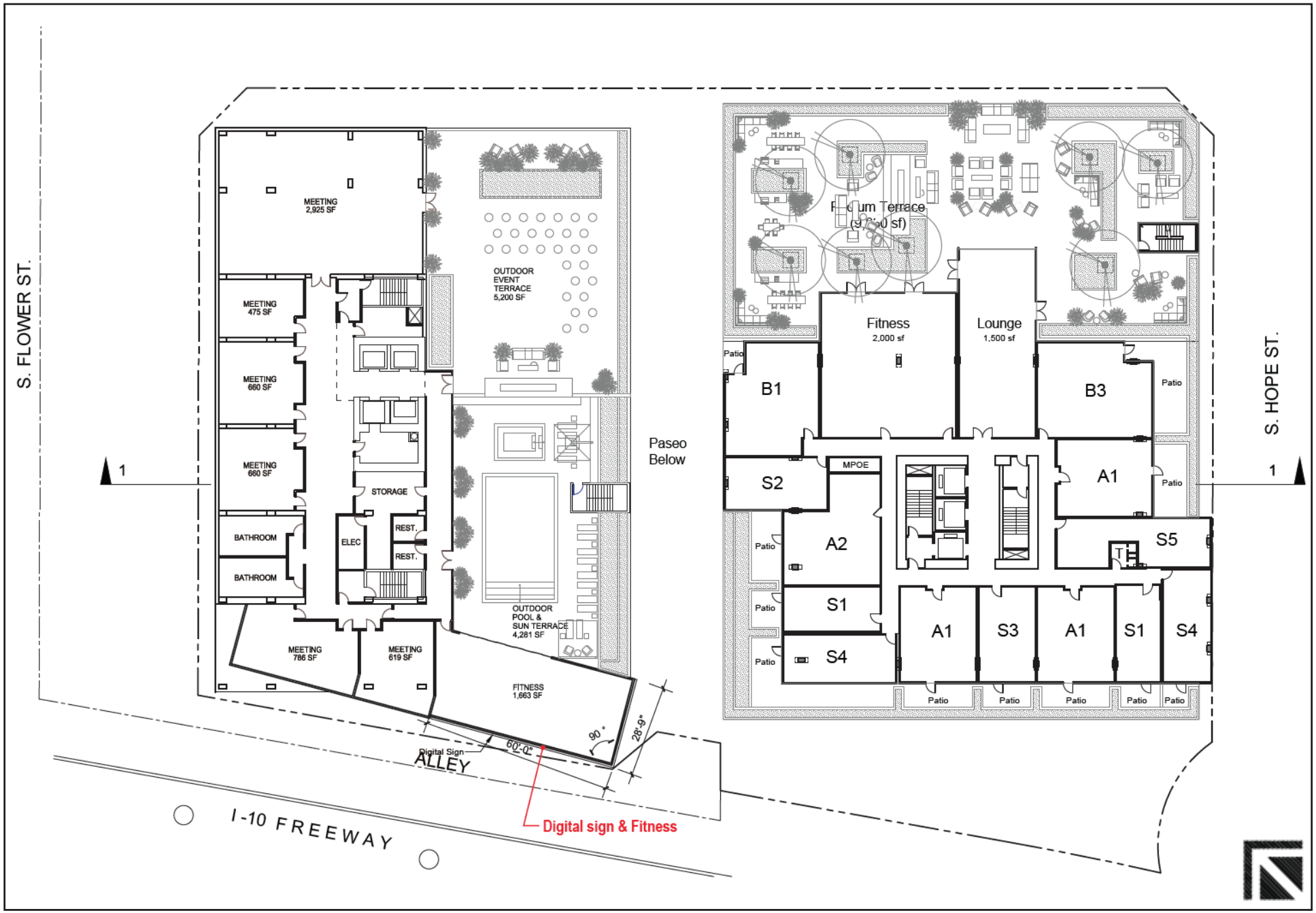
Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.25
Proposed Signage Program - 3rd Level Plan



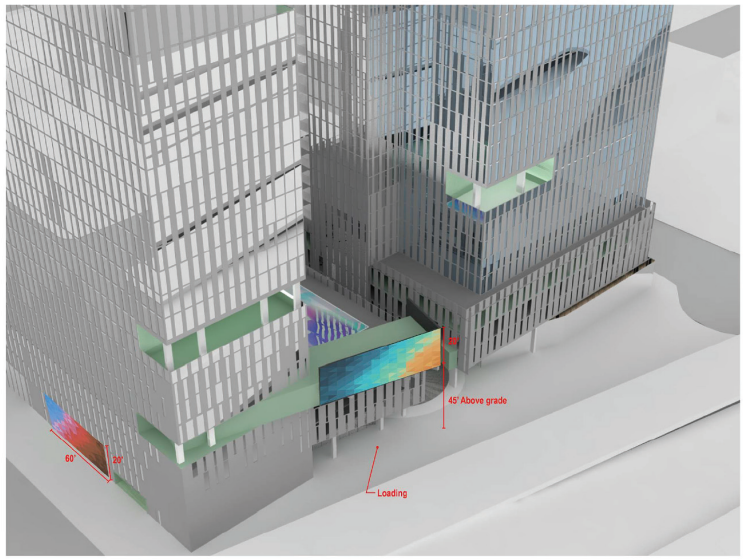
Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.26
Proposed Signage Program - 4th Level Plan

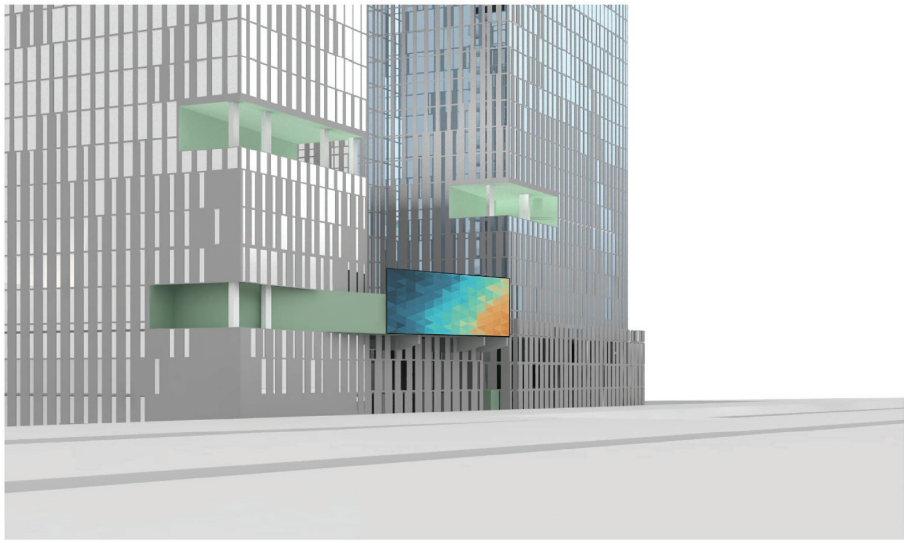


Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.27
Proposed Signage Program - Podium Level Plan (Level 5)



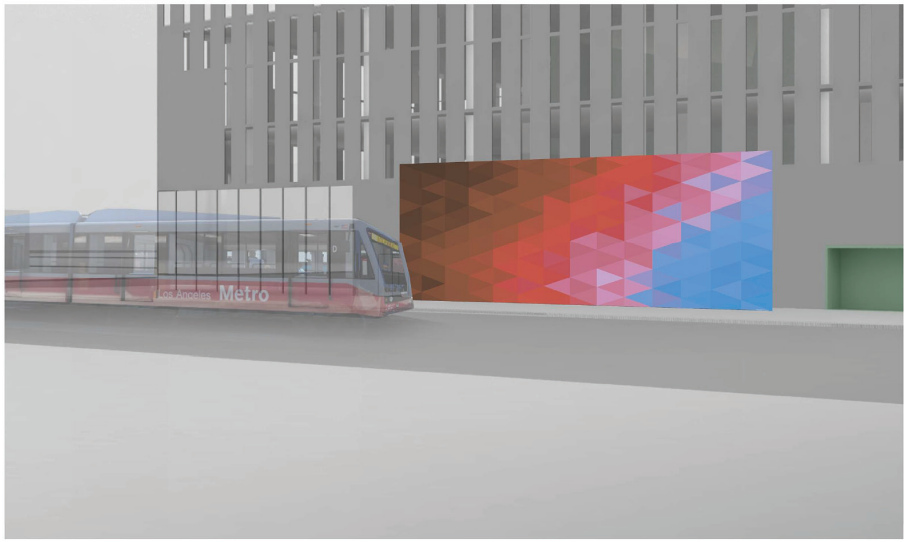
View 1: Aerial view of the southern signage fronting the 10 Freeway.



View 2: Ground level view of the southern signage fronting the 10 Freeway.



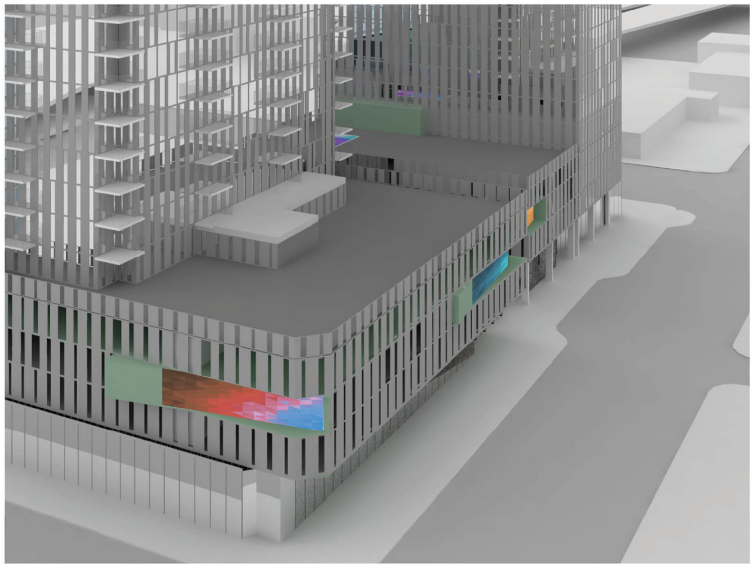
View 3: View of the southern signage from the 10 Freeway.



View 4: Ground level view of the western signage fronting Flower Street.

Source: Togawa Smith Martin Architects, August 17, 2018.

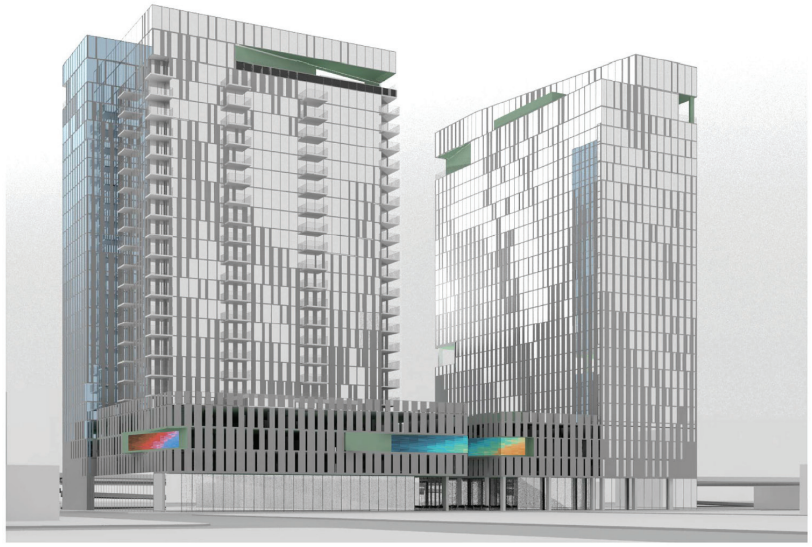
Figure 2.28
Photographs of Proposed Signage Program (Views 1- 4)



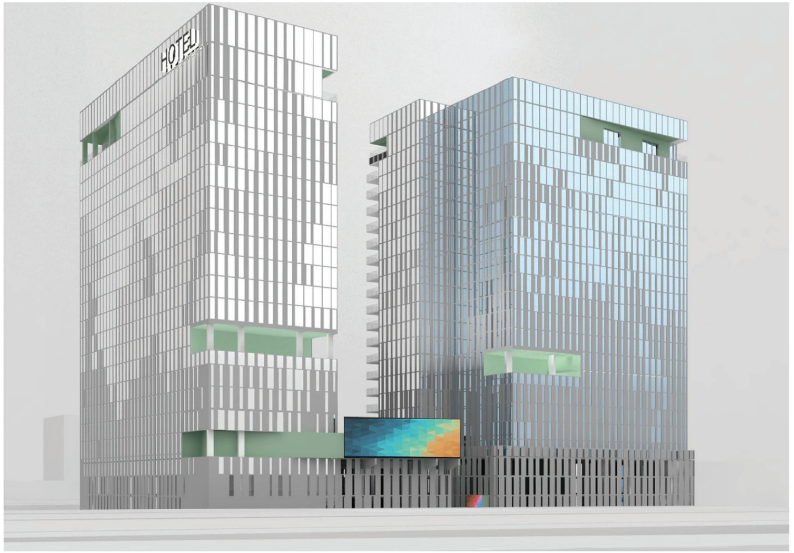
View 5:View of the eastern and northern signage from Hope Street.



View 6: Ground level view of the northern signage fronting Venice Boulevard.



View 7: View of the northern and eastern signage from Venice Boulevard.



View 8: View of the southern signage from the 10 Freeway.

Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.29
Photographs of Proposed Signage Program (Views 5 - 8)



View 9: Aerial view of the Project Site looking southwest.



View 9: Aerial view of the Project Site looking northeast.

Source: Togawa Smith Martin Architects, August 17, 2018.

Figure 2.30
Photographs of Proposed Signage Program (Views 9 - 10)

Table 2.6
Proposed Off-Site Digital Signage Program Sign Area Totals

Sign Location	Feet Above Grade	Dimensions	Sign Area (square feet)
1. Fronting Flower Street	at grade	20' x 60'	1,200
2. Fronting Venice	27' above grade	8' x 16'	128
3. Fronting Venice	27' above grade	8' x 50'	400
4. Fronting the 10 Freeway	45' above grade	20' x 60'	1,200
5. Fronting Hope Street	27' above grade	8' x 40'	320
6. Fronting the on-site	27' above grade	8' x 30'	240
7. Fronting the on-site	27' above grade	8' x 33'	264
8. Fronting the on-site	17' above grade	8' x 7'	56
9. Fronting the on-site	17' above grade	8' x 20'	160
10. Fronting the on-site	17' above grade	8' x 15'	120
11. Fronting the on-site	45' above grade	20' x 30'	600
		TOTAL	**4,688**

Source: Venice Hope Group, LLC, August 17, 2018.

10. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 32 months, with the start of construction anticipated in mid-2023 and final buildout occurring in 2026. Construction activities associated with the Project would be undertaken in five main phases: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; (4) finishing and architectural coatings; and (5) paving/landscaping. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities.

Haul Trucks

All construction and demolition debris would be recycled to the maximum extent feasible. For recycling efforts, Downtown Diversion (operated by Waste Management, Inc.) accepts construction and demolition waste for recycling and is located approximately 3 miles east of the Project Site (approximately 6 miles round trip).[9] Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to either the Sunshine Canyon Landfill located approximately 30 miles north of the Project Site, or the Azusa Landfill located 25 miles east of the Project Site. Both facilities accept construction and demolition debris and inert waste from areas within the City of Los Angeles. For soil hauling, it is anticipated that soil exported from the Project Site would be deposited at a donor or receiving site, such as the Azusa Landfill.

[9] *Los Angeles County, Department of Public Works, Construction and Demolition Debris Recycling Facilities in Los Angeles County, accessed January 2019.*

In the event a donor site is not identified at the time of excavation, soil would be transported to the Sunshine Canyon Landfill, or the Azusa Landfill as described above.

Approval of a haul route will be required prior to construction. For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve haul trucks with up to a 14 cubic yard hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The anticipated haul route for transporting soil to the Sunshine Canyon Landfill would travel east on Venice Boulevard to Grand Avenue, south on Grand Avenue to W. 17th Street, and west on 17th Street to the I-10 Freeway on-ramp. Inbound haul trips would exit the I-10 Freeway at S. Olive Street, proceed north on Olive Street to W. 17th Street, and take 17th Street eastbound to the Project Site driveway on Hope Street. Construction and demolition haul trucks transporting material to either the Downtown Diversion facility or the Azusa Landfill would travel eastbound on Venice Boulevard to Grand Avenue, southbound on Grand Avenue to W. 18th Street, and east on W. 18th Street to the Los Angeles Street – I-10 Freeway on-ramp. Cement trucks from one of the ready-mix cement facilities in southeast Los Angeles would utilize the same eastbound route to the I-10 Freeway as described above, exiting on Alameda Street.

Hauling hours are anticipated to be 7:00 AM to 4:00 PM, Monday through Friday. The haul route for the Project will be subject to final approval by the Deputy Advisory Agency. Trucks are expected to be staged on-site or in the roadway, where parking and travel lanes would be temporarily closed.

11. Related Projects

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the Project's cumulative impacts. "Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts [CEQA Guidelines Section 15130 (b)(1)(A)].

An adequate discussion of a project's significant cumulative impacts can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

For purposes of the list-based approach, a total of 9 proposed, recently approved, under construction, or reasonably foreseeable projects have been identified within ¼-mile radius from

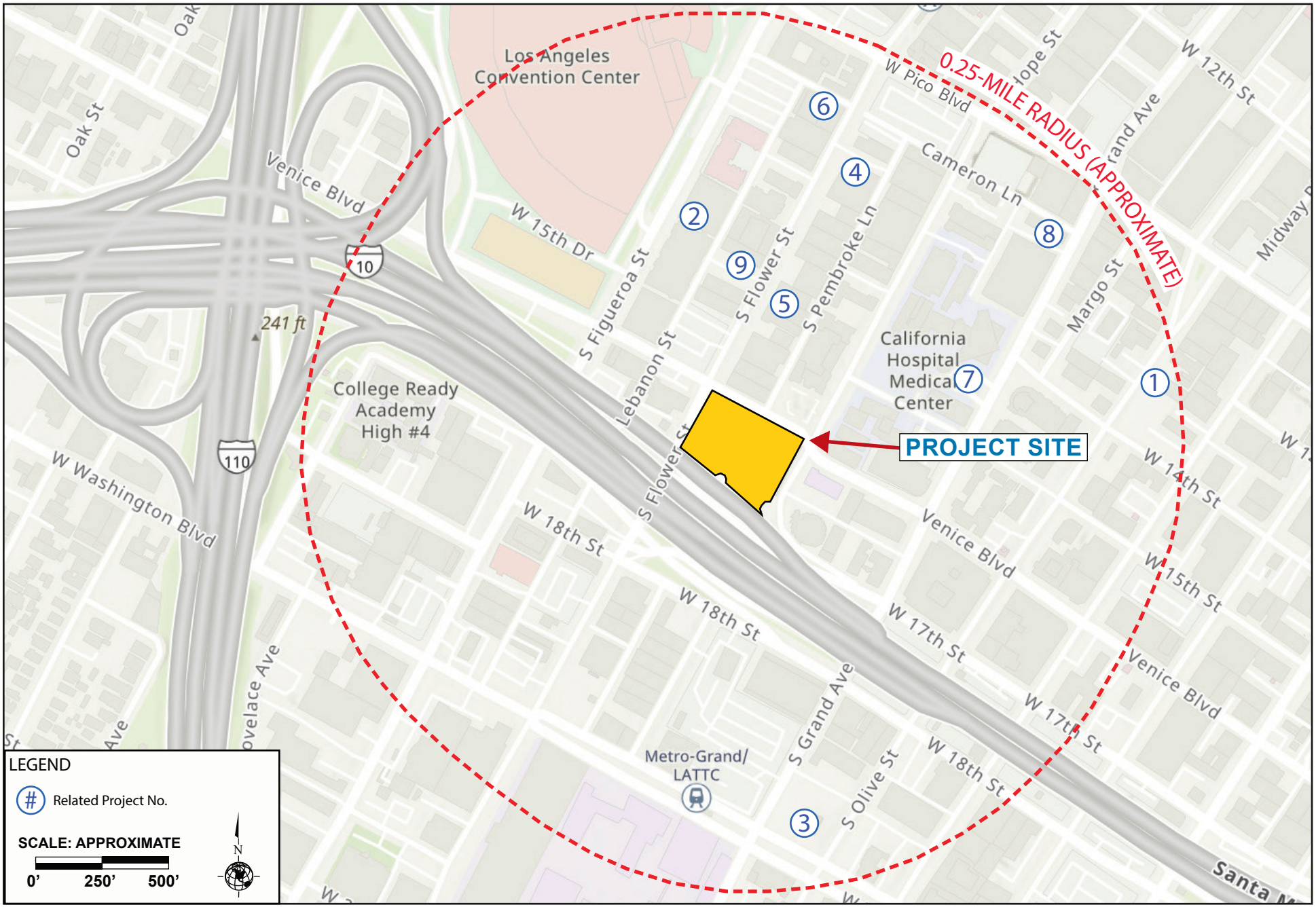
the Project Site, that have been determined to have the potential to produce cumulative impacts on the environment, when considered in conjunction with the Project.[10] These related projects are identified in Table 2.7, Related Projects, below. The project location for each related project is identified in Figure 2.31, Related Projects Location Map.

Table 2.7
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Size	Units
1	14th & Olive Project	1340 S. Olive St.	Condominiums Retail	154 10,700	du sf
2	1400 S. Figueroa Residential Project	1400 S. Figueroa St.	Apartments Retail	106 4,834	du sf
3	Mixed-use Building ENV2008-0386EA 2008-CEN-4672	233 W. Washington Bl	Apartments Retail	160 24,250	du sf
4	Mixed-use	1334 W. Flower St.	Apartments Retail/Restaurant	146 6,270	du sf
5	Mixed-use	1410 S. Flower St.	Apartments Retail	152 1,184	du sf
6	1323 S. Flower St. MU	1323 S. Flower St.	Hotel Apartments Bar/Restaurant	132 48 3,685	rooms du sf
7	1401 S. Grand Ave.	1401 S. Grand Ave.	Emergency Department Retail	148,465 6,000	sf sf
8	1317 S. Grand Avenue	1317 S. Grand Avenue	Apartments	151	du
9	1411 S. Flower Street	1411 S Flower Street	Apartments	227	du

Notes:
du = dwelling unit, sf = square feet
- Related projects within ¼-mile of the Project Site were identified.
Source: The Mobility Group, Transportation Study, South Park Towers Project, April 2019. City of Los Angeles, Department of City Planning, Case Reports and Mapping, BiWeekly Case Filings Map (2020 to 2022), https://planning.lacity.org/resources/case-reports, accessed December 2022.

[10] *Source: The Mobility Group, November 2018. Related Projects List was compiled from LADOT project list as of October 25, 2018 and DCP Project Application submittals through October 16, 2018.*



Source: ArcGIS Basemap; The Mobility Group 2019 and City of Los Angeles, DCP, 2022.

Figure 2.31
Related Projects Location Map

D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Project. The Sustainable Communities Environmental Assessment (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 Proposed Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1) Pursuant to **LAMC Section 17.01 and Section 17.15**, a Vesting Tentative Tract Map 82213, to create one ground lot and 4 airspace lots for a high-density urban mixed-use Project containing a maximum of 250 residential apartment units, 300 hotel guest rooms and approximately 13,120 square feet of ground floor commercial space, and a haul route for the export of 28,000 cubic yards of soil.

2) Pursuant to **LAMC Section 14.5.6 B**, approval of a Transfer of Floor Area Rights (TFAR) for greater than 50,000 square feet of floor area for a Transit Area Mixed-Use Project, from the Los Angeles Convention Center (Donor Site) at 1201 S. Figueroa Street, a City-owned property, to the Project Site (Receiver Site) for the approximate amount of 226,121 square feet of floor area.

3) Pursuant to **LAMC Section 12.24 W.1**, a Conditional Use Permit (CUB) for the sale of a full-line of alcoholic beverages for on-site consumption only within the proposed hotel.

4) Pursuant to **LAMC Section 16.05**, Site Plan Review for the new construction of 452,630 square feet including 250 dwelling units, 300 hotel rooms and 13,120 square feet of ground-floor commercial area.

5) Pursuant to **LAMC Section 12.21 G**, a Director's Determination to allow for up to a 10% reduction in the total required usable open space.

6) Pursuant to **LAMC Section 12.24 S**, a 20% decrease in the required parking for the hotel.

7) Pursuant to **LAMC Section 12.32 S**, approval of a Supplemental Use Sign District (SN) to establish a new Sign District to permit off-site signage. The proposed SN would set forth sign regulations, procedures, guidelines, and standards for the Project Site, which constitutes at least one block.

Pursuant to various sections of the LAMC, the Applicant will request administrative approvals and permits from the Building and Safety Department and other municipal agencies for Project construction actions, including but not limited to the following: demolition, excavation, shoring, grading, foundation, building, street tree removal, and tenant improvements.

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Section 3. SCEA Criteria

A. Regulatory Background

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

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

B. Transit Priority Project Criteria

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

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS;

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

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

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

[2] *CARB Executive Order No. G-20-239.*

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

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

Consistency with Criterion #1:

The Project is consistent with the general use designation, density, and building intensity and applicable policies specified for the project area in the SCAG 2020-2045 RTP/SCS

In September 2020, SCAG's Regional Council adopted Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. On October 30, 2020, CARB accepted SCAG's quantification of GHG emission reductions from Connect SoCal and determined that Connect SoCal would, if implemented, achieve the 2035 GHG emission reduction targets established by CARB.[3]

Use Designation, Density, and Building Intensity

SCAG's Scenario Planning Model (SPM) is a data management, land use planning, and modeling tool.[4] SCAG employs a series of Place Types to describe the different types of land uses in the region. The Place Types—each comprised of a mix of different building types along with assumptions about characteristics such as the amount of land devoted to streets, parks, and civic areas – represent the complete range of development types and patterns that make up a scenario. These Place Types contain a large amount of information relating to the characteristics of the landscape, including jobs and housing density, urban design, mix of land uses and are intended for modeling purposes. SCAG also categorizes existing land uses into land use types. Land Development Categories (LDCs)—Urban, Compact, or Standard—represent distinct forms of land use, ranging from dense and walkable mixed-use urban areas well served by transit, to lower-intensity, less walkable places where land uses are segregated and most trips are made via automobile. These LDCs are an aggregation of the 35 Place Types and are used to describe the general conditions within a specific area.[5] The Connect SoCal Sustainable Communities Strategy

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[3] *CARB Executive Order No. G-20-239.*

[4] *Southern California Association of Government, Connect SoCal, 2020-2045 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS) Technical Report, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf, accessed April 2021. (see p.44)*

[5] *Southern California Association of Government, Connect SoCal, 2020-2045 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS) Technical*

Technical Report, forecasts LDCs by county and subregion for 2045; Exhibit 1: Connect SoCal Forecasted Regional Development Pattern.[6]

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

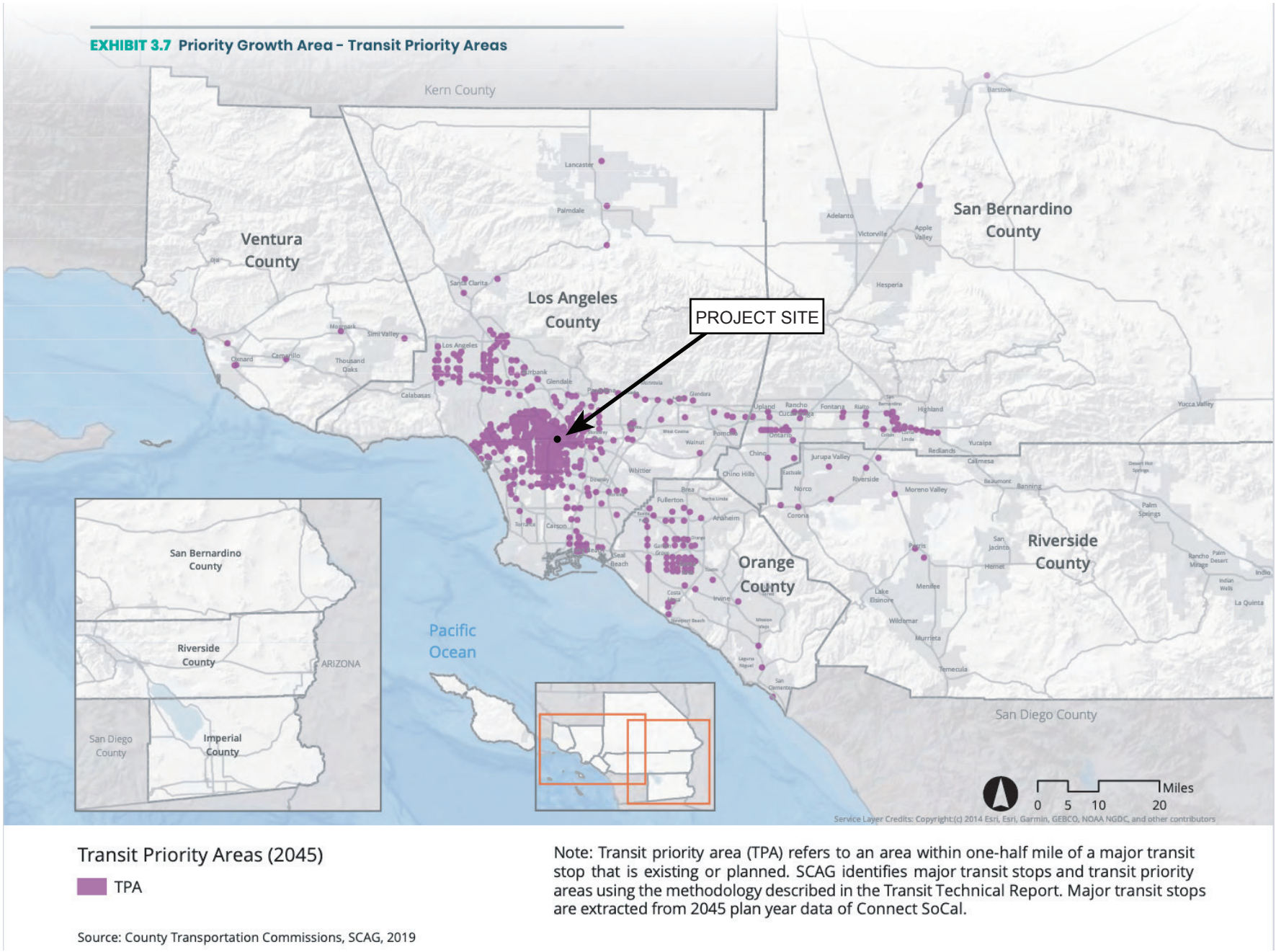
> *areas are often found within and directly adjacent to moderate and high density urban centers. Virtually all 'Urban' growth would be considered infill or redevelopment. The majority of housing units are multifamily and attached single family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. Well-connected street networks and the mix of intensity of uses result in a highly walkable environment. Enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.*[7]

The Project would be consistent with the Urban LDC. The Project is located within a highly urbanized area within the City of Los Angeles, in the South Park area of Downtown Los Angeles. The Project is an infill project that would provide mixed-use development with multi-family units, hotel guest rooms, and neighborhood serving ground floor commercial uses. The Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743, which supports transit opportunities and promotes a walkable environment (see Figure 3.1, Connect SoCal Transit Priority Areas (2045) and Figure 3.2, Connect SoCal High Quality Transit Areas (2045), below). The Project Site is served by two nearby Metro Stations within a half-mile: the Pico Station which serves the Metro A Line and Metro E Line, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station which serves the Metro Blue Line and is located approximately 0.3 mile southeast of the Project Site. The predominant housing type in the project area is multi-family residential. As such, the Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

Report, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf, accessed April 2021. (see pp.44-45)

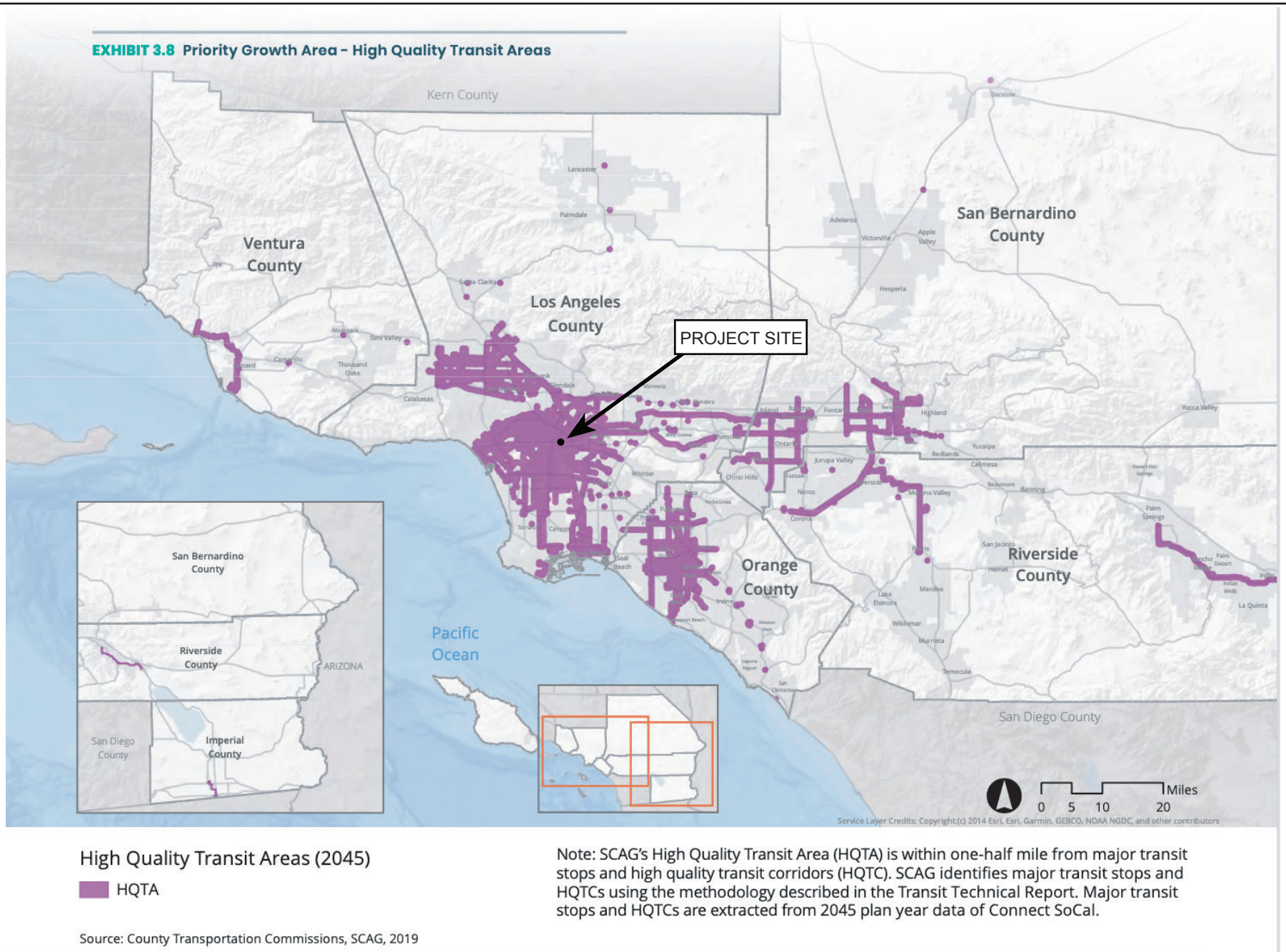
[6] *Southern California Association of Government, Connect SoCal, 2020-2045 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS) Technical Report, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf, accessed April 2021. (see p.33)*

[7] *Southern California Association of Government, Connect SoCal, 2020-2045 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS) Technical Report, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy.pdf, accessed April 2021. (see p 45)*



Source: SCAG Connect SoCal, September 3, 2020.

Figure 3.1
Connect SoCal Transit Priority Areas (2045)



Source: SCAG Connect SoCal, September 3, 2020.

Figure 3.2
Connect SoCal High Quality Transit Areas (2045)

Connect SoCal further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Project is a mixed-use project, which includes a 22-story hotel building with 300 guest rooms and 3,120 square feet of commercial/retail space and a 23-story mixed-use residential and commercial building with 250 residential dwelling units and 10,000 square feet of ground floor commercial/retail/restaurant space. The Project promotes pedestrian activity and bicycling activity by providing landscaping along the public right-of-way, retail spaces, and a paseo located between the two towers. The Project would provide parking that is consistent with LAMC standards. Therefore, the Project is similar to other developments within HQTAs.

The Connect SoCal SCS includes various urban footprint place types, including mixed use, residential, commercial, office, R&D, industrial, civic and open space. (Connect SoCal, SCS Technical Report, Appendix 1, SPM Place Types). The Project is consistent with a range of place types within the Urban LDC.

Urban Mixed-Use districts are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Workers, residents, and visitors are well-served by transit, and can walk or bicycle for many of their transportation needs. The land use mix for this place type is typically approximately 18 percent residential, 16 percent employment, 45 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net FAR is 9.0, floors range from 15 - 100, and the gross density ranges from 50 - 500 employees per acre and 40 - 500+ households per acre.[8]

The Project is most consistent with the Urban Mixed-Use Place Type because of the following characteristics: the Project is a mixed-use development up to 23 stories tall consisting of residential, hotel, and retail uses in a highly-urbanized part of Central Los Angeles, on a Site that is currently occupied by 4 office/retail buildings. Adjacent land uses include commercial/retail, industrial uses, multi-family residential buildings, park, and institutional buildings. The Project is approximately 53 percent residential, and approximately 47 percent non-residential with a non-residential FAR of 2.80 to 1. The Project area is supported by high levels of regional and local transit. The Project will construct approximately 145 dwelling units per acre and will have a total net FAR of 6 to 1.

Based on the regional growth projections in the Connect SoCal plan, the City of Los Angeles had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City of Los Angeles will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately

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[8] *Southern California Association of Government, Connect SoCal, 2020-2045 Regional Transportation / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS) Technical Report, Appendix 1 of 1, SPM Place Types, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_sustainable-communities-strategy-appendix.pdf?1606002108 (see p.1).*

1,793,000 residences (or a 31% increase since the year 2016). SCAG's population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 3.1, below.

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

Population			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
Households			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
Employment			
Region	**2016**	**2045**	**% Growth (2016-2045)**
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%

Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.

The Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.77 million persons by 2045. As shown in Table 3.1, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

Based on the community's current household demographics (e.g., an average of 2.25 persons per multi-family household for the City of Los Angeles), the construction of 250 additional residential dwelling units would result in an increase in approximately 563 net permanent residents in the City of Los Angeles.[9] Further, the Project includes a mixed-use hotel building with 300 guest rooms and a total of 13,120 square feet of ground-floor commercial space. The Project would generate the need of approximately 192 employees.[10] The proposed increase in housing units and population would be consistent with SCAG's forecast of 426,000 additional households, approximately 837,500 persons, and 287,600 jobs in the City of Los Angeles between 2016 and 2045. As such, the Project would not cause growth (i.e., new housing) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout or that would result in an adverse physical change in the environment.

Applicable Policies Specified for the Project Area

The Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Project is consistent with SCAG policies. Refer to Checklist Question XIV(a). Population and Housing, in Section 4, Initial Study Checklist and Environmental Analysis, for a discussion on the Project's consistency with SCAG's population and housing growth. The Project would be consistent with applicable goals and policies presented within SCAG's Connect SoCal. Refer to Table 3.2, below, for the Project's consistency analysis.

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

Goals and Policies	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**No Conflict.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Project.
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The Project Site is located in a highly urbanized area with the City of Los Angeles within a High Quality Transit Area (as defined by SCAG). The Project would develop 250 dwelling units and 300 hotel guest rooms (439,510 square feet of floor area), and 13,120 square feet of retail area within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** This goal is directed towards SCAG and does not apply to the Project. However, the Project would support this goal by providing residents and visitors with

[9] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[10] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

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

Goals and Policies	Consistency Assessment
	convenient access to public transit and opportunities for walking and biking. The RTP states, "A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum impact to the environment, while not compromising future transportation needs. Essentially, sustainability refers to how our decisions today impact future generations. One of the measures used to evaluate transportation system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system in a state of good repair." As discussed in the Project's VMT Analysis (located in Appendix F.1 of this SCEA), the Project would result in a less than significant VMT impact with mitigation. As such, the Project would not conflict with the RTP/SCS's goals and policies related to a sustainable regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project Site is located less than one-half mile from the intersection of two Metro Stations, the Pico Station and the Grand/LATTC Station. Additionally, the Metro E Line railway immediately borders the Project Site to the west. The Project would promote the use of a variety of transportation options by providing residents and visitors with convenient access to public transit and opportunities including regional transportation and bus systems. Therefore, the Project would not conflict with this goal.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. As discussed further in Section 4.III, Air Quality, construction and operational generated by the Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 4.VI, Energy and 4.VIII, Greenhouse Gas Emissions, the Project would comply with all regulations and policies aimed at reducing energy and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Project would not conflict with this Goal.
Goal 6 Support healthy and equitable communities.	**No Conflict.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Project. Nevertheless, the Project would develop 250 dwelling units and 300 hotel guest rooms (439,510 square feet of floor area), and 13,120 square feet of ground floor commercial floor area within a HQTA and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes walkability. The location of the Project

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

Goals and Policies	Consistency Assessment
	promotes the use of a variety of transportation options, which includes walking and biking reducing the need to own an automobile and pay for parking. In addition, the Project will provide 252 bicycle spaces to promote travel by bicycle, which would encourage bicycling as a form of exercise and transportation. Furthermore, the Project would provide 25,768 square feet of open space, which would include a podium and amenity area, an elevated terrace, a roof terrace, and private balconies. The available open space would provide workspace, lounging, and recreation for its patrons, guests, and residents. Therefore, the Project would therefore not conflict with this Goal.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** As stated above, the Project Site is located in a highly urbanized area near downtown Los Angeles within a HQTA and a Transit Priority Area (as defined by SB 743). The Project Site is located less than one-half mile from the intersection of two Metro Stations, the Pico Station and the Grand/LATTC Station. Additionally, the Metro Expo Line railway immediately borders the Project Site to the west. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The Project would develop dwelling units and commercial uses near mass transit and in close proximity to services, retail stores, and employment opportunities. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** This Goal is directed towards SCAG and the City of Los Angeles and does not apply to the Project. However, as discussed above, the Project is located in a highly urbanized area near downtown Los Angeles within a HQTA and a Transit Priority Area, therefore providing transportation that results in efficient travel. The Project is therefore consistent with this Goal.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** The Project Site is located in a highly urbanized area with the City of Los Angeles within a HQTA and a TPA. The Project would develop 250 dwelling units and 300 hotel guest rooms (439,510 square feet of floor area), and 13,120 square feet of retail area The Project Site is located less than one-half mile from two Metro Stations, the Pico Station and the Grand/LATTC Station. Additionally, the Metro Expo Line railway immediately borders the Project Site to the west. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.

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

Goals and Policies	Consistency Assessment
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** This Goal is not applicable to the Project since the Project Site does not contain any natural or agricultural lands.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**No Conflict.** This Guiding Principle is directed towards SCAG and the City of Los Angeles and does not apply to the Project.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**No Conflict.** This Guiding Principle is directed towards SCAG and the City of Los Angeles and does not apply to the Project.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**No Conflict.** The Project would develop 250 dwelling units and 300 hotel guest rooms (439,510 square feet of floor area), and 13,120 square feet of ground floor commercial floor area within a HQTA and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Project is consistent with this guiding principle.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**No Conflict.** This Guiding Principle relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupant vehicles. Nevertheless, the Project is located within a HQTA and a TPA. The Project would support public transportation and other alternative methods of transportation (e.g., transit, walking and biking). Therefore, the Project would not conflict with this Guiding Policy.
Guiding Principle 5 Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**No Conflict.** This Guiding Principle is directed towards SCAG and the City of Los Angeles and does not apply to the Project. However, this relates to the Connect SoCal Goal 5, above. The Project is an infill development in an area that promotes the use of a variety of transportation options, which includes walking, biking and the use of public transportation. As discussed further in Section 4. III, Air Quality, air quality emissions generated by the Project's construction and operational activities would not exceed the regional thresholds of significance set by the SCAQMD. Additionally, as further discussed in Sections 4.VI, Energy, and 4.VIII, Greenhouse Gas Emissions, the Project would comply with all regulations and policies aimed at reducing energy consumption and greenhouse gas emissions, reducing the reliance on fossil fuels, and promoting energy-efficiency standards and transportation. Therefore, the Project would not conflict with this Guiding Principle.

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

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

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

Goals and Policies	Consistency Assessment
environmental and health impacts while fostering continued growth in trade and commerce.	
Sustainable Communities Strategy 1 Focus Growth Near Destinations & Mobility Options	**No Conflict.** As stated previously, the Project would develop 250 dwelling units, 300 hotel rooms, and 13,120 square feet of commercial/retail area within a HQTA and a TPA, near downtown Los Angeles. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. The Project will encourage improved access and mobility by providing both residential and commercial uses on a single site. Thus, the Project is consistent with this strategy.
Sustainable Communities Strategy 2 Promote Diverse Housing Choices	**No Conflict.** The Project includes 250 residential dwelling units, 300 hotel rooms, and 13,120 square feet of commercial uses. Of the 250 residential dwelling units, the unit mix would include 75 studio units, 104 one-bedroom units, 68 two-bedroom units, and 3 three-bedroom units. Further, the Project would locate multi-family residential and commercial uses in close proximity to public transportation, thus providing housing and jobs near transit. The Project would also include 160 residential bicycle parking spaces, 60 hotel bicycle parking spaces, and 32 commercial bicycle parking spaces in compliance with LAMC requirements. Thus, development of the Project would support a reduction in greenhouse gas emissions. Moreover, as discussed in the Project's VMT Analysis (located in Appendix F.1 of this SCEA), the Project would not create a significant impact with respect to increased VMTs. Thus, the Project is consistent with this strategy.
Sustainable Communities Strategy 3 Leverage Technology Innovations	**No Conflict.** This strategy is directed towards SCAG and does not apply to the Project.
Sustainable Communities Strategy 4 Support Implementation of Sustainability Policies	**No Conflict.** This strategy is directed towards SCAG and does not apply to the Project.
Sustainable Communities Strategy 5 Promote a Green Region	**No Conflict.** This strategy is directed towards SCAG and does not apply to the Project. However, this relates to the Connect SoCal Goal 5, above. See response to Connect SoCal Goal 5 and Guiding Principle 5, above.

Source: Southern California Association of Governments, Connect SoCal (2020-2045 RTP/SCS), September 2020.

Consistency with Criterion #2:

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

The Project includes the construction of a total floor area of 452,630 square feet. The Project includes 250 dwelling units (which encompasses approximately 241,510 square feet of residential floor area), comprising 53 percent of the total floor area. The Project includes 300 hotel guest rooms and 13,120 square feet of ground floor commercial space (which encompasses approximately 211,120 square feet of nonresidential uses), compromising 47 percent of the total floor area. This results in a nonresidential FAR of approximately 2.80:1 As such, the Project would be consistent with this Criterion.

Consistency with Criterion #3:

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

The Project Site is approximately 1.73 acres before street easements and dedications. The Project includes 250 dwelling units; as such, the Project provides approximately 145 dwelling units per acre. Therefore, the Project would be consistent with this Criterion.

Consistency with Criterion #4:

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

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

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

The Project Site is located less than one-half mile from the intersection of two Metro Stations, the Pico Station and the Grand/LATTC Station. Additionally, the Metro Expo Line railway immediately borders the Project Site to the west. Moreover, Connect SoCal identifies the Project Site as being

within a HQTA. Therefore, the Project is located within a high-quality transit corridor. The Project is consistent with this Criterion.

C. Scope of Analysis

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. SCEAs may be used for analysis of TPPs that have incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior applicable EIRs and can use the provisions in PRC Section 21159.28. As such, pursuant to Section 21159.28, the SCEA is not required to reference, describe, or discuss growth inducing impacts, or project-specific or cumulative impacts from cars and light trucks on global warming or the Regional Transportation Network. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

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

D. Incorporation of Applicable Mitigation Measures from Prior EIRs

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

The Mitigation Monitoring and Reporting Program for the Connect SoCal PEIR (SCAG MMRP) does not include project level mitigation measures that are required of the Project. However, the SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The City has complied with PRC Section 21151.2 by reviewing all of the suggested mitigation measures in the SCAG MMRP and reviewed them for imposition on the Project. No mitigation measures were imposed if the SCAG MMRP mitigation measure was found not to be applicable. If the Project was not found to be in substantial compliance or the mitigation measure was found applicable, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure (including the mitigation measures developed for the SCEA prepared for the Project). The City's analysis is found in Table 3.3 below.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Aesthetics *Scenic Vista/Scenic Resources*	**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 designed (e.g., railings rather than walls)	**This Mitigation Measure is not incorporated into the Project**. As set forth in Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Checklist Question I(a) in Section 4** of this SCEA that the Project's impacts would not have an adverse aesthetic effect.
Aesthetics *Visual Character/ Quality of Public Views, Conflicts with Zoning*	**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	**This Mitigation Measure is not incorporated into the Project.** As set forth above, Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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: o Use transparent panels to preserve views where sound walls would block views from residences; o Use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; o 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.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Aesthetics *Light/Glare/ Shade*	**PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	**This Mitigation Measure is not incorporated into the Project.** As Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."
Agricultural Resources *Conversion of Farmland to Non-Agricultural Use*	**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.	**This Mitigation Measure is not incorporated into the Project.** The City determined, based on the analysis of this topic in **Checklist Question II(a) in Section 4** that the Project would not result in potentially significant impacts to agriculture and forestry.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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 bank10 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.	
Agricultural Resources *Zoning for Ag Use, Williamson Act Contract*	.**PMM AG-2:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	**This Mitigation Measure is not incorporated into 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. The City determined, based on the analysis of this topic in **Checklist Question II(b) in Section 4** that the Project would not result in potentially significant impacts to agriculture and forestry.
Agricultural Resources *Conflict with Ag Zoning, Rezoning of Forest Land / Loss of Forest Land/ Conversion to Non-Forest Use*	**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	**This Mitigation Measure is not incorporated into the Project.** No farmland, forest land, or agricultural activity exists on or in the vicinity of the Project Site. The Project Site, as it currently exists, is fully developed with four office/retail buildings and a parking lot. The City determined, based on the analysis of this topic in **Checklist Question II(c) in Section 4** that the Project would not result in potentially significant impacts to agricultural and forestry.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	as to prevent conflict with agriculture and forestry resources.	
Agricultural Resources *Conversion of Farmland to Non-Ag Use, Conversion of Forest land to Non-Forest Use*	**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. **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.	**This Mitigation Measure is not incorporated into the Project**. No farmland, forest land, or agricultural activity exists on or in the vicinity of the Project Site. The Project Site, as it currently exists, is fully developed with four office/retail buildings and a parking lot. The City determined, based on the analysis of this topic in **Checklist Question II(d) in Section 4** that the Project would not result in potentially significant impacts to agricultural and forestry.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
Air Quality *Potential to Violate AQ Standard, Substantially Contribute to Existing, Projected Air Quality Violation / Cumulative Increase of Criteria Pollutant for Which Project is Non-Attainment / Expose Sensitive Receptors to Substantial Pollutant Concentrations*	**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 roadways. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district 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	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures (RCM).** It is subject to the following regulatory compliance measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible: • Air Quality (Site Clearing, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the provisions of District Rule 403. • The Project shall comply with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. • The Project shall comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). • In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds)

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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 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	during construction shall be limited to five minutes at any location. • In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. • The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. • The Project shall comply with South Coast Air Quality Management District Rule 1108 limiting the volatile organic compound content from cutback asphalt. • The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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: • Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. • Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. • Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: • Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). • Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. • Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. • Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. • Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. • Encourage the participation in the Green Ship Incentives. • Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: • Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. • Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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 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%.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	• Nonroad diesel engines on site shall be Tier 2 or higher. • Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. • Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. • Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. • The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: o Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. o 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. o 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	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. • The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: o Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. o Any problems with the equipment or emission controls. o Certified copies of fuel deliveries for the time period that identify: ▪ Source of supply ▪ Quantity of fuel ▪ Quantity of fuel, including sulfur content (percent by weight) cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency: • Install programmable thermostat timers • Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24) • Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.) • Install higher efficacy public street and area lighting • Limit outdoor lighting requirements • Replace traffic lights with LED traffic lights • Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power • Utilize a combined heat and power system • Establish methane recovery in Landfills and Wastewater Treatment Plants.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	• Locate project near bike path/bike lane • Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. • Provide traffic calming measures, such as: o marked crosswalks o count-down signal timers o curb extensions o speed tables o raised crosswalks o raised intersections o median islands o tight corner radii o roundabouts or mini-circles o on-street parking o 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: o Elimination (or reduction) of minimum parking requirements o Creation of maximum parking requirements o Provision of shared parking • Require residential area parking permit • Provide ride-sharing programs o Designate a certain percentage of parking spacing for side sharing vehicles o Designating adequate passenger loading and unloading and waiting areas for side-sharing vehicles o Providing a web site or messaging board for coordinating rides o Permanent transportation management association membership and finding requirement.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Biological Resources *Adverse Effect on Candidate, Sensitive, or Special Status Species / Adverse Effect on Riparian Habitat or Other Sensitive Natural Community / Adverse Effect on Wetlands / Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	**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. 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 Endangered Species Act, Section 2081 of the California Endangered Species Act to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: 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 non-native habitat wherever feasible, so as to avoid or minimize impacts to these species e) Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.	**This Mitigation Measure is not incorporated into the Project.** The Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site is improved with four office/retail buildings. The City determined, based on the analysis of this topic in **Checklist Question IV(a) in Section 4** that the Project would not result in potentially significant impacts to biological resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	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.	
<u>Biological Resources</u> *Adverse Effect on Riparian Habitat or Other Sensitive Natural Community / Adverse Effect on Wetlands /*	**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. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such	**This Mitigation Measure is not incorporated into the Project.** The Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City. The Project Site

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan	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 fur-bearing 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. When 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.	is improved with four office/retail buildings. The City determined, based on the analysis of this topic in **Checklist Question IV(b) in Section 4** that the Project would not result in potentially significant impacts to biological resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	
Biological Resources *Adverse Effect on Wetlands / Interfere with the Movement*	**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. Such measures may include the following	**This Mitigation Measure is not incorporated into the Project.** The Project Site is not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. The City

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan	or other comparable measures identified by the Lead Agency: a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Section 404 and 401 of the CWA, wherever practicable and feasible. 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 federally and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: o Permitee-responsible mitigation o Contribution of in-kind-in-lieu fees	determined, based on the analysis of this topic in **Checklist Question IV(c) in Section 4** that the Project would not result in potentially significant impacts to biological resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	○ 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, the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: ○ Avoidance ○ Impact Minimization ○ On-site alternatives ○ Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform a formal wetland delineation.	
<u>Biological Resources</u> *Interfere with the Movement of Species / Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	**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. 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	**This Mitigation Measure is not incorporated into the Project.** The Project Site is not located within or adjacent to migratory fish, wildlife species, or established native resident and/or migratory wildlife corridors, and native wildlife nursery sites. The Project Site is improved with four office/retail buildings and is located in an urbanized area of the City. The City determined, based on the analysis of this topic in **Checklist Question IV(d) in Section 4** that the Project would not result in potentially significant impacts to biological resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities with 250 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 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 wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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: o Wildlife movement in buffer zones o Corridor realignment o Appropriately spaced breaks in center barriers o Stream rerouting o Culverts o Creation of artificial movement corridors such as freeway under- or overpasses o 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) Reducing 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	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize 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, and 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, 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.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	• 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.	
Biological Resources *Conflict with Local Policies or Ordinances Protecting Biological Resources / Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	**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. 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	**This Mitigation Measure is not incorporated into the Project.** The Project Site is completely paved and developed, and no significant vegetation exists, including protected trees. No protected biological resources or tree species, such as oak trees, currently exist on the Project Site. As such, none of the Mitigation Measures that pertain to local policies or ordinances protecting biological resources, such as the City of Los Angeles Protected Tree Ordinance, are applicable. The Project would include the removal and replacement of up to seven street trees subject to the review and approval of the Department of Urban Forestry. To clarify steps that the Project would take to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement the following regulatory compliance measure, which would require a nesting bird survey be conducted in the event any tree trimming or tree removal activities occur during the nesting season, to avoid potentially significant effects related to nesting native birds that are in the jurisdiction and responsibility of the City: • Habitat Modification (Nesting Native Birds) o Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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	March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	
Biological Resources *Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	**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. 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 **PMM-BIO-2**, where applicable.	**This Mitigation Measure is not incorporated into the Project**. No locally designated natural communities are known to occur on or adjacent to the Project Site. Therefore, none of the Mitigation Measures that pertain to Habitat Conservation Plans or Natural Community Conservation Plans are applicable to the Project. The City determined, based on the analysis of this topic in **Checklist Question IV(f) in Section 4** that the Project would not result in potentially significant impacts to biological resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Cultural Resources *Substantial Adverse Change in Significance of Historical Resource / Substantial Adverse Change in the Significance of Archaeological Resource*	**PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic 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: o Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be	**The Project would substantially conform to this Mitigation Measure.** The Project does not involve and will not affect any historic resources. Further, it is not anticipated that the Project Site contains significant archaeological resources. However, if an unexpected discovery should occur compliance with the following regulatory compliance measure, which is consistent with the SCAG RTP/SCS Program EIR MM-CULT-1 in avoiding potential impacts to inadvertent finds of historic or archeological cultural resources: • Archaeological. Consistent with CCR Section 15064.5 and PRC Section 21083.2, in the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether additional study is warranted. Depending upon the significance of the find under CEQA (14 CCR 15064.5(f); PRC Section 21083.2), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. Compliance with the above-listed regulatory compliance measures substantially conforms to this Mitigation Measure, and would reduce any potentially significant impacts. Also, see discussion regarding Tribal Cultural Resources in **Checklist Question XVIII(b) in Section 4** of this SCEA.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	(depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the records indicate that no previous survey has been conducted, the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. 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.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Cultural Resources *Disturb Human Remains, Those Interred Outside Cemeteries*	**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: o Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly 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. o If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Checklist Question V(c) of Section 4** of this SCEA, that the Project would not result in a potentially significant impact to cultural resources. The Project is subject to the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts on human remains: • Cultural Resources (Human Remains): If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	
Geology and Soils *Result in Substantial Soil Erosion or Loss of Topsoil*	**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. Such measures may include the following or other comparable measures identified by the Leady 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	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Checklist Question VII(b)** of **Section 4** that the Project would not result in potentially significant impacts to geology and soils. The Project is subject to the following regulatory compliance measures, which are capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil: • Geology (Erosion /Grading/ Short-Term Construction Impacts): The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. • Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The Applicant shall implement Best Management Practices (BMPs) during grading and excavation to reduce erosion. • Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with

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Topic	Measure	Applicability to the Project
	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.	Construction and Land Disturbance Activities for the Project.
Geology and Soils *Directly or Indirectly Destroy Unique Paleontological Resource or Site or Unique Geologic Feature*	**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.	**The Project would substantially conform to this Mitigation Measure.** It is not anticipated that the Project Site contains unique paleontological resources or sites and unique geologic features. However, if unexpected discovery should occur compliance with the following regulatory compliance measure, which is capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features, are equal to or more effective than this mitigation measure: • Paleontological. Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Compliance with the above-listed regulatory compliance measure substantially conforms to this Mitigation Measure, and would reduce any potentially significant impacts.

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Topic	Measure	Applicability to the Project
	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	

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Topic	Measure	Applicability to the Project
	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.	
Greenhouse Gases *Directly or Indirectly Generate GHG Emissions that May Have Significant Impact on Environment / Conflict with Applicable Plan, Policy, Regulation*	**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. 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.	**The Project already substantially complies with this Mitigation Measure through compliance with Regulatory Compliance Measures**. The Project is subject to various regulatory compliance programs listed below, that are capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or the City of Los Angeles. The Project is subject to the LA Green Building Code and would incorporate various design measures that would serve to reduce the projects GHG emissions. The LA Green Building Code mandates energy conservation standards for building energy systems, mandates water conservation features and required solid waste reduction programs. In addition, the LA Green Building Code provides requirements for on-site electric vehicle charging stations, which

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Topic	Measure	Applicability to the Project
	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;	would promote the use of alternative fuel or hybrid fuel vehicles. The Project would encourage transit use, carpooling, and bike-share as the Project Site is located in a transit rich environment and would incorporate bike parking and electric vehicle parking stalls pursuant to the LAMC. The Project's location on an infill lot in an area that is well served by light rail and bus services would greatly reduce residents and visitor's dependence on automobiles, which would further serve to reduce GHG emissions. • The Project must meet Title 24 2019 standards and include ENERGY STAR appliances. • The Project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. • As mandated by the LA Green Building Code, the Project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. • The Project must comply with the electric vehicle ready and electric vehicle charging requirements set forth in Ordinance No. 186,485. • In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code. • The Project shall comply with City Ordinance No. 184,248 (effective June 2016) amended provisions of Articles 4 and 9 of Chapter IX of the LAMC which establish citywide water efficiency standards and require water-saving

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Topic	Measure	Applicability to the Project
	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; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and	systems and technologies in buildings and landscapes to conserve and reduce water usage. Additionally, the Project would implement Mitigation Measures MM-T-1 through MM-T-3, which would aim to reduce trips and VMT, including vehicle trip reduction incentives and services for Project employees and/or tenants and incentives for using alternative travel modes.

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Topic	Measure	Applicability to the Project
	carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike 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 the use of modes other than single-occupancy vehicles; 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 brownfield 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	

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Topic	Measure	Applicability to the Project
	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.	
Hazards and Hazardous Materials *Significant Hazard due to Routine Transport, Use, or Disposal of Hazardous Materials / Reasonably Foreseeable Upset and Accident Conditions, Hazardous*	**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	**This Mitigation Measure is not incorporated into the Project**. Mitigation Measure PMM HAZ-1 addresses general hazardous materials from construction and operation of a facility with routine transport, use, or disposal of hazardous materials. The following Mitigation Measure is incorporated, which would be more effective than SCAG EIR Mitigation Measures as it addresses on-site soil contamination and is capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site during temporary construction activities:

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Topic	Measure	Applicability to the Project
Emissions or Materials Near School	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: o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. o The location of such hazardous materials. o An emergency response plan including employee training information. o 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.	• Mitigation Measure **MM-HAZ-1** (Soil Management Plan): o A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source. o The Applicant shall provide confirmation that the VOC concentrations in soil vapor meet the residential scenario Department of Toxic Substances Control-modified Screening Levels (DTSC-SLs) established in DTSC's Human Health Risk Assessment (HHRA). o In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy. o The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission. o The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following: ▪ A qualified environmental consultant shall be present on the Project Site at

Table 3.3
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Topic	Measure	Applicability to the Project
	j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use 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.	the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE. ▪ Soil Monitoring during soil disturbance include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring. ▪ Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal. ▪ Impacted soil shall be transported to an approved treatment/disposal facility. ▪ When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer. ▪ Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors. ▪ The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere. ▪ The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location. ▪ Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.

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Topic	Measure	Applicability to the Project
		The following regulatory compliance measure is required in conjunction with the Project: • Asbestos. Due to the age of the building(s) being demolished, toxic and/or hazardous construction materials may be located in the structure(s). If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
Hazards and Hazardous Materials *Reasonably Foreseeable Upset and Accident Conditions, Hazardous Emissions or Materials Near School / Emit Hazardous Emissions, Handle Hazardous Materials, Substances, Waste within One-Quarter Mile of Existing or Proposed School*	**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	**This Mitigation Measure is not incorporated into the Project.** Mitigation Measure PMM HAZ-2 addresses hazardous materials from operation of a facility with routine transport, use, or disposal of hazardous materials that may result in reasonably foreseeable upset and accident conditions. The following Mitigation Measure is incorporated, which would be more effective than the SCAG EIR Mitigation Measures as it is capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site during temporary construction activities: • Mitigation Measure **MM-HAZ-1** (Soil Management Plan): o A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled, and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source. o In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.

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Topic	Measure	Applicability to the Project
	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.	○ The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission. ○ The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following: ▪ A qualified environmental consultant shall be present on the Project Site at the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE). ▪ Soil Monitoring during soil disturbance include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring. ▪ Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal. ▪ Impacted soil shall be transported to an approved treatment/disposal facility. ▪ When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer. ▪ Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors. ▪ The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent

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		particulate emissions to the atmosphere. ▪ The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location. ▪ Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.
Hazards and Hazardous Materials *Emit Hazardous Emissions, Handle Hazardous Materials, Substances, or Waste within One-Quarter Mile of Existing or Proposed School*	**PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	**The Project would substantially conform to this Mitigation Measure.** The City determined, based on the analysis of this topic in **Checklist Question IX in Section 4** of this SCEA**,** incorporation of Mitigation Measure MM-HAZ-1, above, and compliance with regulatory compliance measures for ACM and LBP removal, potential impacts to nearby schools would be less than significant.
Hazards and Hazardous Materials *Located on a Hazardous Materials Site Section 65962.5*	**PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines,* a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. b) Where warranted due to the known presence	**The Project would substantially conform to this Mitigation Measure.** The City determined, based on the analysis of this topic in **Checklist Question IX(d) in Section 4** of this SCEA**,** compliance with mandatory state and federal regulations and incorporation of Mitigation Measure MM-HAZ-1, above, potential impacts would be reduced to less than significant levels.

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	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	

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Topic	Measure	Applicability to the Project
	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.	

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Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	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.	
Hazards and Hazardous Materials *Impair Implementation of, Physically Interfere with, Adopted Emergency Response or*	**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:	**This Mitigation Measure is not incorporated into the Project**. The Project Site is not located along a designated disaster route or an adopted emergency response or evacuation plan by the City or the County. Therefore, none of the Mitigation Measures that pertain to emergency response plans or evacuation plans are applicable to the Project. The City determined, based on the analysis of this

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
Emergency Evacuation Plan	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.	topic in **Checklist Question IX(f) in Section 4** that the Project would not result in potentially significant impacts to an emergency evacuation plan.
Hydrology and Water Quality *Violate Water Quality Standards or Waste Discharge Requirements / Alteration of Site Drainage Pattern That Would Increase Erosion or Siltation / Alteration of Site Drainage That Would Increase Flooding / Runoff Exceeding Stormwater Drainage System Capacity* Wildfire *Expose People, Structures to Downslope, Downstream Flooding, Landslides Resulting from Runoff, Post-Fire Slope Stability, or Drainage Changes* Utilities and Service Systems – Wastewater	**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,	**The Project already substantially complies with this Mitigation Measure through compliance with Regulatory Compliance Measures.** As further discussed in **Checklist Question X(a) in Section 4** of the SCEA, it is subject to the following regulatory compliance measures, which are capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies: • Hydrology (National Pollutant Discharge Elimination System General Permit): Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities for the Project. • Hydrology (Stormwater Pollution (Demolition, Grading, and Construction Activities)). The Project would include the handling, storage, and disposal of construction materials containing pollutants; the maintenance and operation of construction equipment; and earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. • Hydrology (Standard Urban Stormwater Mitigation Plan): Prior to the issuance of

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Topic	Measure	Applicability to the Project
Require Relocation, New Wastewater Treatment or Storm Drainage Facilities, Construction of Which Could Cause Significant Environmental Effect	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.	a grading permit, the Project shall comply with the SUSMP and/or the Site-Specific Mitigation Plan to mitigate stormwater pollution as required by Ordinance Nos. 172,176 and 173,494.
<u>Hydrology and Water Quality</u> *Substantially Decrease Groundwater Supply or Interfere with Groundwater*	**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	**The Project already substantially complies with this Mitigation Measure.** It is subject to the following standard regulatory compliance measures, which are capable of avoiding or reducing the potential impacts to groundwater resources that are within the

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
Recharge / Alteration of Site Drainage That Would Increase Flooding / Runoff Exceeding Stormwater Drainage System Capacity / Conflict with Water Quality Control Plan, Sustainable Groundwater Management Plan	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 when 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.	jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies: • Hydrology (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. • Hydrology (Best Management Practices): The Project shall comply with the Best Management Practices in accordance with the Development Best Management Practices Handbook Part B Planning Activities.
Hydrology and Water Quality *In Flood Hazard, Tsunami, or Seiche Zone, Risk of Pollutant Release Due to Inundation*	**PMM HYD-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines,* a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	**This Mitigation Measure is not incorporated into the Project**. The Project Site is not located within a designated flood zone, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map. The City determined, based on the analysis of this topic in **Checklist Question X(d) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to hydrology and water quality.
Land Use	**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	**This Mitigation Measure is not incorporated,** because the City determined, based on the analysis of this topic in

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
Potential to Physically Divide Established Community	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: o Selecting alignments within or adjacent to existing public rights of way. o Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. o 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: o Alignment shifts to minimize the area affected. o Reduction of the proposed right-of-way take to minimize the overall area of impact. o Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	**Checklist Question XI(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to physically dividing a community.
<u>Land Use</u> *Conflict with Applicable Land Use Plan, Policy, or Regulation*	**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) Where an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an	**This Mitigation Measure is not incorporated into the Project.** The City determined, based on the analysis of this topic in **Checklist Question XI(b) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to conflicting with an applicable land use plan, policy or regulation.

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	amendment to the general plan or land use regulation.	
Mineral Resources *Loss of Availability of a Known Mineral Resource / Loss of Mineral Resource Recovery Site Delineated on Local General Plan, Specific Plan, Other Land Use Plan*	**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.	**This Mitigation Measure is not incorporated into the Project.** The City determined, based on the analysis of this topic in **Checklist Question XII(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to mineral resources.

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
Noise *Substantial Temporary or Permanent Increase in Ambient Noise Levels In Excess of Standards Established in Local General Plan or Noise Ordinance / Generation of Excessive Groundborne Vibration or Groundborne Noise Levels / For Project Located in Vicinity of Private Airstrip, Airport Land Use Plan, or Within Two Miles of Public Airport, Expose People to Excessive Noise Levels*	**PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that 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 of shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.	**The Project already substantially conforms with this Mitigation Measure.** It is subject to the following regulatory compliance measures that avoid or reduce the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies: • The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574. • The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048. Additionally, the City imposes the following Mitigation Measures that are consistent with the SCAG EIR Mitigation Measures as they will avoid or reduce the significant effects of noise impacts: • Increased Noise Levels (Demolition, Grading, and Construction Activities) **MM-N-1** To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. **MM-N-2** The project contractor shall use power construction equipment with noise shielding and muffling devices. **MM-N-3** The project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound

	h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. 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 of "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned 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	barrier shall include ¾ inch plywood or other sound absorbing material. **MM-N-4** During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent residential land uses does not exceed 5 dBA over the ambient noise levels. **MM-N-5** An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any complaints shall be rectified within 24 hours of their receipt. **MM-N-6** The Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school. Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Hope Street, north of the Venice Boulevard, adjacent to the school, during school hours.

Table 3.3
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Topic	Measure	Applicability to the Project
	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.	
<u>Noise</u> *Generation of Excessive Groundborne Vibration or Groundborne Noise Levels*	**PMM NOISE-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines,* a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:	**The Project would substantially conform to this Mitigation Measure.** The Project construction would not include any pile driving, which is typically associated with high vibration impacts. As such, the measures recommended in PMM NOISE-2 (a), (b), and (c) are not applicable to the Project. The Project would include PMM-

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	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.	NOISE-2 (d) to (f) of the SCAG EIR mitigation measure as they avoid or reduce the significant effects of groundborne vibration impacts.
Population and Housing *Displacement of People or Housing, Requiring Replacement Housing Elsewhere*	**PMM POP-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures Identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible.	**This Mitigation Measure is not incorporated into the Project.** The Project would consist of the development of new housing and commercial land uses on a site that is currently occupied by four office/retail buildings. No displacement of existing housing would occur with the development of the Project, and therefore, none of the suggested measures are applicable.

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Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
	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.	
Public Services – Fire *Adverse Impacts Associated with New or Physically Altered Fire Protection Facilities Construction of Which Could Cause Significant Environmental Impacts*	**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 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, 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.	**The Project substantially conforms to this Mitigation Measure.** As discussed in **Checklist Question XV(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to emergency response facilities.

Table 3.3
Applicability of Project-Level Mitigation Measures from
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Topic	Measure	Applicability to the Project
Public Services – Police *Adverse Impacts Associated with New or Physically Altered Police Facilities, Construction of Which Could Cause Significant Environmental Impacts*	**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 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, 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.	**The Project substantially conforms to this Mitigation Measure.** The City has determined, based on the analysis of this topic in **Checklist Question XV(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact related to emergency response facilities.
Public Services – Schools *Adverse Impacts Associated with New or Physically Altered Educational Facilities, Construction of Which Could Cause Significant Environmental Impacts*	**PMM PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	**This Mitigation Measure is not incorporated into the Project.** The City has determined, based on the analysis of this topic in **Checklist Question XV(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact to schools.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Public Services – Library *Adverse Impacts Associated With New Or Physically Altered Library Facilities, Construction of Which Could Cause Significant Environmental Impacts*	**PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	**This Mitigation Measure is not incorporated into the Project.** The City has determined, based on the analysis of this topic in **Checklist Question XV(a) in Section 4** of this SCEA, that the Project would not result in a potentially significant impact to libraries.
Recreation *Increased Use of Existing Parks Such That Substantial Physical Deterioration of Recreational Facilities Would Occur / Adverse Impacts Associated With New Or Physically Altered Park Facilities, Construction of Which Could Cause Significant Environmental Impacts / Include Recreational Facilities, Require Construction or Expansion Which Might Have Adverse Effect*	**PMM REC-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of 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	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** Sections 12.33 and/or 17.12 of the Los Angeles Municipal Code, require the Project Applicant to pay the applicable Quimby fees for construction of dwelling units which would reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities. Additionally, the Project already substantially complies with this Mitigation Measure because it would include open space as required by the LAMC.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Transportation, Traffic, and Safety *Conflict Or Be Inconsistent With CEQA Guidelines Section 15064.3(b).*	**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. 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: o Include TDM mitigation requirements for new developments; o Incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; o Provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; o Implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; o Develop TDM-specific performance measures to evaluate project-specific and system-wide performance; o Incorporate TDM performance measures in the decision-making process for identifying transportation investments; o Implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and o Set aside funding for TDM initiatives.	**The Project would substantially conform to this Mitigation Measure.** The City imposes the following Mitigation Measures that are consistent with the SCAG EIR Mitigation Measures and would be more effective in avoiding or reducing the VMT impacts a to less than significant level: **MM T-1: Transportation Demand Management (TDM) Promotions and Marketing** The Project shall provide all eligible employees and residents with marketing and promotional materials to educate and inform travelers about site-specific transportation options and effects of their travel choices. **MM T-2: Shared Mobility** The project shall provide on-demand access to shared mobility options as an incentive to consider other transportation travel modes The Project shall provide five car-share spaces, ten bike-share spaces, and a rideshare program. **MM T-3: Unbundle Parking** The Project shall provide unbundled parking, which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. The analysis estimated that a parking space would cost at least $220 per month for residents to lease. The Applicant shall unbundle parking costs from residential lease payments and charge at least $220 per month per parking space for residents who park on site.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	○ 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.	
Transportation, Traffic, and Safety *Result in Inadequate Emergency Access/ Impair or Interfere with Emergency Response or Evacuation Plan*	**PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • 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.	**This Mitigation Measure is not incorporated into the Project.** The Project would be in compliance with this provision as it has prepared a VMT Analysis in December 2019 and a Transportation Analysis which was reviewed and approved by the LADOT in July 2019 (see Appendix F.2 to this SCEA). As noted in the LADOT's correspondence of approval the driveway and loading zone requires separate review and approval and will need to be coordinated with DOT's Citywide Planning Coordination Section. Additionally, access will be reviewed by the LAFD to ensure the Project conforms to all applicable emergency evacuation plans, and other regional and local plans establishing access during emergencies.

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	○ 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.	
Tribal Cultural Resources *Cause Substantial Adverse Change in Significance of Tribal Cultural Resource*	**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. 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 Project would substantially conform to this Mitigation Measure through compliance with Regulatory Compliance Measures**. The City has initiated and concluded the AB 52 consultation process with regard to tribal cultural resources. Based on the findings of these technical reports and upon conclusion of the AB 52 consultation process, no known historic, archaeological or tribal cultural resources occur on site. No archaeological resources were identified within the project site or

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	immediate vicinity as a result the CHRIS records search or through the NAHC SLF search. Accordingly, the City has determined that the following Condition of Approval is equal to or more effective than this Mitigation Measure in avoiding potential impacts to inadvertent finds of historic, archeological, or tribal cultural resources: • If objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed. Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.
Utilities and Service Systems – Solid Waste *Generate Solid Waste in Excess of State or Local Standards, or in Excess of Local Infrastructure, Impair Solid Waste Reduction Goals / Comply with Federal, State, Local Management and Reduction Statutes and Regulations*	**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 consistent 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)	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** As described below, the Project is subject to the following regulatory compliance measure that avoids or reduces the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent:[11] • Solid Waste Recycling Construction/Demolition. The Project shall comply with LAMC Section 66.32.1. • Solid Waste Recycling – Operational. The Project shall comply with LAMC Section 66.32 and AB 341.

[11] *AB 341, website: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341, accessed November 2021.*

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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	

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
	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.	
Utilities and Service Systems – Wastewater *Require Relocation, New Wastewater Treatment or Storm Drainage Facilities, Construction of Which Could Cause Significant Environmental Effect / Result in Determination By Wastewater Treatment Provider That it Has Adequate Capacity to Serve Project*	**PMM USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** It is subject to the following standard conditions and regulatory compliance measures and project design feature that avoid or reduce the significant effects on utilities and service systems[12]: o As part of the normal construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase. o Utilities (Low Impact Development Plan): Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. o Utilities (Water): The project shall comply with Ordinance No. 170,978 (Water Management Ordinance). o Utilities (Water): The Project would be required to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through

[12] *AB 341, website: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341, accessed November 2021.*

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
		4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. o **PDF-PU-1 Water.** As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project: o Fixtures • ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle • High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf • Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm o Landscape and Irrigation • Drip/Subsurface Irrigation (Micro-Irrigation) • Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together) o Pool • Domestic Pool/Spa recirculating filtration equipment • Water-Saving Pool Filter
<u>Utilities and Service Systems – Water Supply</u> *Require Relocation, New or Expanded Water Facilities, Construction of Which Could Cause Significant Environmental Effects / Have Sufficient Water Supplies to Serve*	**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	**The Project already substantially conforms with this Mitigation Measure through compliance with Regulatory Compliance Measures.** The LADWP has approved a Water Supply Assessment *(See Appendix L to this SCEA)* and has determined that it has sufficient water available to serve the Project, and the Project would be subject to the following regulatory compliance measures and project design feature that avoid or reduce the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Project and Future Development	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.	that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies: • The project shall comply with Ordinance No. 170,978 (Water Management Ordinance). • The Project would be required by L.A. Green Building Code to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20%. • **PDF-PU-1 Water.** As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project: ○ Fixtures • ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle • High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf • Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm ○ Landscape and Irrigation • Drip/Subsurface Irrigation (Micro-Irrigation) • Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together) ○ Pool • Domestic Pool/Spa recirculating filtration equipment • Water-Saving Pool Filter
<u>Wildfire</u> *Exacerbate Wildfire Risks,*	**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	**This Mitigation Measure is not incorporated into the Project** as the Project Site is not located within State-

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Expose Project Occupants to Pollutant Concentrations from Wildfire	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 for reduced 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	designated Very High Fire Hazard Severity Zones. The Project Site as it currently exists is fully developed with four office/retail buildings and a parking lot. and is located in an urbanized area of the City. The City determined, based on the analysis of this topic in **Checklist Question IX(a)-(d) in Section 4** that the Project would not result in potentially significant impacts to wildfire.
Wildfire *Require Installation or*	**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	**This Mitigation Measure is not incorporated into the Project.** The Project Site is not located within State-designated

Table 3.3
Applicability of Project-Level Mitigation Measures from
Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)

Topic	Measure	Applicability to the Project
Maintenance of Associated Infrastructure that May Exacerbate Fire Risks, May Result in Temporary or Ongoing Impacts to Environment / Expose People, Structures to Downslope, Downstream Flooding, Landslides Resulting from Runoff, Post-Fire Slope Stability, or Drainage Chang	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 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.	Very High Fire Hazard Severity Zones. The Project Site as it currently exists is fully developed with four office/retail buildings and a parking lot. and is located in an urbanized area of the City. The City determined, based on the analysis of this topic in **Checklist Question IX(a)-(d) in Section 4** that the Project would not result in potentially significant impacts to wildfire.

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

Section 4. Initial Study Checklist and Environmental Analysis

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

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

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

I. Aesthetics

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

Senate Bill 743 - Environmental Quality: Transit Oriented Infill Projects

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "Transit Priority Area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by

an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the *L.A. CEQA Thresholds Guide*.

The Project is a mixed-use infill development with 250 residential units, 300 hotel guest rooms, and 13,120 square feet of commercial/retail uses. SB 743 defines an infill site as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses. The Project Site meets this definition. As discussed in Section 2 of this SCEA, Project Description, the Project Site is designated as a "Transit Priority Area" per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.[1]

The Project Site is served by two nearby Metro Stations within one-half mile of the Project Site: the Pico Station, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station, located approximately 0.4 mile southeast of the Project Site. Both stations provide frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods and are identified as located within a Transit Priority Area. Accordingly, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. The aesthetics analysis below is provided for informational purposes only. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers.

IMPACT ANALYSIS

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

No Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantages. A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista. The Project Site is developed with four commercial/office and retail buildings with surface parking. No scenic views or vistas characterize the Project Site or immediately surrounding project area. The Project Site is located within the South Park community of Downtown Los Angeles. The surrounding properties are developed with commercial/retail, industrial, multi-family residential, a park, and institutional land uses. **As such, the Project would not have an adverse effect on a scenic vista and no**

[1] *City of Los Angeles, Department of City Planning, Zoning Information No. 2452 Transit Priority Areas (TPAs)/exemptions to aesthetics and parking within TPAs pursuant to CEQA (ZI-2452), accessed November 2021.*

impact would occur. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

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

No Impact. The nearest State designated Scenic Highway to the Project Site is the Route 210, located approximately 10 miles north of the Project Site.[2] The Project Site is developed with four commercial/office and retail buildings with surface parking. There are no rock outcroppings or unique geologic features on the Project Site. Based on the findings in the Historic Resource Assessment prepared by Historic Preservation Consulting, the Project Site does not contain any historic buildings and is not within a scenic highway.[3] Moreover, the Project Site does not contain any native vegetation or locally protected tree species.[4] There are five street trees on the public right-of-way on the west side of Hope Street and two street trees on the public right-of-way on the south side of Venice Boulevard, adjacent to the Project Site that will be removed and replaced.[5] The removal of landscaped street trees would result in less than significant impact as these trees would be replaced in consultation with the Department of Urban Forestry. **Therefore, since the Project Site is not located near, or visible from any designated or eligible State scenic highway, and does not contain scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized scenic natural features visible form any State-designated scenic highway, the Project would not result in substantial adverse effects. Furthermore, pursuant to ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."**

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

No Impact. The Project Site is located in an urbanized area and is developed with four commercial/office and retail buildings with surface parking. The Project Site is located in the Central City Community Plan area and is within the boundaries of the South Park Neighborhood District of downtown Los Angeles. The South Park area is recognized to be a mixed-use community with a significant concentration of housing. The design of development projects on the Project Site are further guided by the Downtown Design Guide. The Project would not conflict with regulations governing scenic quality. The Project Site is currently zoned C2-2D-O with a General Plan land use designation of Community Commercial. There is no height limit for

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2 *ArcGIS, California Scenic Highways, accessed November 2021.*

3 *Historic Preservation Consulting, Historic Resource Assessment, 1601-1617 South Hope Street, 1600-1616 South Flower Street, Los Angeles, CA ("Historic Resource Assessment"), December 2018 (See Appendix J).*

4 *The Tree Resource, Protected Tree Report, Property at 1600 S. Flower St. & 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018 (See Appendix I).*

5 *The Tree Resource, Protected Tree Report, Property at 1600 S. Flower St. & 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018 (See Appendix I).*

development on the Project Site. Construction of the Project would entail demolition of all existing buildings and the new construction of a 22-story hotel building on the eastern portion of the Project Site and a 23-story mixed-use residential building on the western portion of the Project Site.

As part of the construction process, the Applicant would install a temporary fencing around the perimeter of the Project Site for security purposes and to block views of the Project Site from the pedestrian level. Installation of temporary fencing and compliance with the applicable regulatory compliance measures would further reduce visual impacts caused during the construction of the Project. For example, temporary signs on temporary construction walls shall comply with the construction requirements of LAMC Section 14.4.16 E. Pursuant to LAMC Section 14.4.17, the Applicant would also be required to maintain the construction barrier to be free and clear of any unauthorized signs and graffiti within 24 hours of occurrence. Compliance with these regulatory compliance measures would ensure the scenic quality of the Project Site during construction.

With respect to building design, both towers would have multiple elevations and building step-backs. Exterior building materials/features would include retractable glass walls, metal panel screens, digital signs, metal rails, and painted artwork. The Project also includes a supplemental use district (SUD) for off-site advertising signage encompassing the entire block bounded by Flower Street, Venice Boulevard, Hope Street, and the southern alleyway. The proposed signage program would provide a comprehensive set of development standards and guidelines related to signage and illumination as it relates to the unified development program. The SUD would be approved through a City Ordinance and would set forth design limits and performance objectives to ensure impacts with respect to light and glare do not adversely affect off site properties. As discussed in further detail in response to Checklist Question XI(b), Land Use and Planning, the Project would be in conformance with the Downtown Design Guide, the Los Angeles Municipal Code (LAMC), and the applicable provisions of the General Plan governing scenic quality. **As such, no impacts would occur with respect to conflicts with applicable zoning or other regulations governing scenic quality. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."**

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

Less Than Significant Impact. While SB 743 provides that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered to have a significant impact on the environment, this law does not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the LAMC, or the City's General Plan, including Specific Plans.[6] The Project is seeking approval of a proposed signage program for the proposed Hope and Venice Supplemental Use District (SUD), which has the potential to increase ambient light and glare in the Project area. Therefore, the following discussion is being provided for

6 *Zoning Information No. 2452 Transit Priority Areas (TPAs)/exemptions to aesthetics and parking within TPAs pursuant to CEQA (ZI-2452), accessed November 2021.*

informational purposes only. The determination of whether the Project results in a significant nighttime illumination impact is generally made considering the following factors: (a) the change in ambient illumination levels as a result of Project sources; and (b) the extent to which Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

The Project would include a proposed signage program with a comprehensive set of development standards and guidelines related to signage and illumination as it relates to the unified development program. The proposed signage program includes one district that incorporates the entire block bounded by Flower Street, Venice Boulevard, Hope Street, and the southern alleyway. There would be a total of 11 digital display signs with a total area of 4,688 square feet. One 1,200 square-foot sign would front Flower Street on the ground level; two signs with a total of 528 square feet, would front Venice Boulevard at 27 feet above grade; one 1,200 square-foot sign would front the 10 Freeway at 45 feet above grade; one 320 square-foot sign would front Hope Street at 27 feet above grade, and six signs, totaling 1,440 square feet, would be located within the on-site paseo at different heights (17 feet, 27 feet, and 45 feet above grade), which can each be viewed from the surrounding roadways and freeway. The total area of signage for each signage type is presented in Table 2.6, Proposed Off-Site Digital Signage Program Sign Area Totals, in Section 2, Project Description of this SCEA.

The proposed signage development standards would include regulations to permit certain types of signage within the proposed SUD area. The locations of the proposed signage on each floor level and locations of the proposed signs on the buildings' facades are shown on Figure 2.24 through Figure 2.30 in Section 2, Project Description of this SCEA.

The Proposed Signage Program would introduce increased daytime glare and nighttime lighting and illumination that currently do not exist on-site or in the surrounding area. For purposes of evaluating the proposed SUD's impact upon light and glare, a Lighting Technical Study was prepared by Francis Krahe & Associate Inc. (see Appendix K to this SCEA). The Lighting Technical Study reviews the parameters that affect light trespass or glare at sensitive use properties in the vicinity of the Project Site, reviews the applicable lighting metrics and regulations pertaining to artificial lighting, examines the existing lighting conditions within and surrounding the Project, and evaluates the illuminated signs to identify potential environmental impacts on surrounding sensitive use properties. The Project's illuminated signs (Sign Lighting) would be authorized by a Sign District if approved by the City and established by an Ordinance pursuant to the provisions of Section 13.11 of the LAMC. A draft Ordinance for the Sign District would be completed as part of the Project entitlements and available before a final City action on the Project. Based on the analysis presented in the Lighting Technical Study, light trespass from the Project Sign at the adjacent sensitive use properties would be below the 3.0 footcandles (fc) maximum threshold as defined by the LAMC. There is no light trespass threshold for commercial use properties, which are not considered light or glare-sensitive receptors. Therefore, at commercial properties where the illuminance is calculated to be above the 3.0 fc threshold, there is no light trespass impact from the Project Sign(s). The Project Signs were also evaluated with respect to glare visible at adjacent sensitive use properties or roadways. To present a conservative analysis, the Lighting Technical Study evaluates the Project Signs with a maximum

luminance of 5000 candela per square meter (cd/m^2) during the day and 300 cd/m^2 at night with all Project Signs operating at all white. Lighting Technical Study concluded that the glare from the signs at sensitive use properties at night had a contrast ratio (a comparison of the maximum sign luminance to the existing average luminance) of less than 30:1, which indicates the signs will not create a new glare condition at adjacent sensitive use properties. The glare at roadways was further evaluated with respect to the standards identified by the California Motor Vehicle Code, which defines maximum sign luminance within drivers' field of view for both day and night. As concluded in the Lighting Technical Study, the Project Signs will not exceed the maximum luminance defined by the California Motor Vehicle Code during the day, at night, and during periods of low sun intensity.

The Project's operational lighting would be installed in building entrances and common open space areas to provide visibility and security for residents and visitors. The amount of light produced by the Project is typical of the existing surrounding urban environment. Additionally, outdoor lighting would be installed with shielding and directed toward the Project Site and not on adjacent properties in accordance with LAMC lighting regulations which require that operational lighting will be directed downward or on the specific on-site feature to be lit or avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Proposed signage and outdoor lighting would be subject to applicable regulations of the LAMC. **As such, the Project would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area and light trespass or glare impacts would be less than significant. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."**

Cumulative Impacts

Less Than Significant Impact. As mentioned above, Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Project, upon an infill site within a Transit Priority Area shall not be considered significant impacts on the environment. The Project Site and all of the related projects that are located within the immediate viewshed of the Project Site are designated as Transit Priority Areas (see map inset provided in Appendix M). Therefore, cumulative aesthetic impacts would be less than significant. Furthermore, as demonstrated in the Lighting Technical Study (see Appendix K to this SCEA), an analysis of the proposed signage program to be instituted as part of a SUD concluded that the proposed signage program will not create a new glare condition at adjacent sensitive use properties. Because light is limited to the areas within the immediate viewshed of the Project Site, and the Project's light and glare impacts are assessed relative to the ambient lighting conditions, the conclusions of the Lighting Technical Study take into consideration cumulative lighting levels from ambient sources within the project area. Based on a review of the related projects list provided in Section 2, Project Description, of this SCEA, there are no other signage SUDs proposed within the immediate viewshed of the Project Site. **As such, cumulative light and glare impacts would not be significant. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."**

II. Agriculture and Forestry Resources

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

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

IMPACT ANALYSIS

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

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The Project Site is currently occupied by four office/retail buildings. No farmland or agricultural activity exists on or in the vicinity of the Project Site. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[7] **Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and no impact would occur.**

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[8] The Project Site does not contain any State-designated agricultural lands or open space. Thus, the Project Site is not subject to a Williamson Act Contract. [9]

The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is currently zoned C2-2D-O with a General Plan land use designation of Community Commercial and is not zoned for agricultural production, and no farmland activities exist on-site. In addition, no Williamson Act Contracts are in effect for the Project Site. **Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract, and no impact would occur.**

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7 *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018 South Los Angeles Map, published November 2020.*

8 *State of California Department of Conservation, Williamson Act Program, accessed November 2021.*

9 *State of California Department of Conservation, Williamson Act Program, accessed November 2021.*

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

No Impact. The Project Site is zoned C2-2D-O, which has a land use designation of Community Commercial in the Central City Community Plan Area. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site. **Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production and no impact would occur.**

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

No Impact. The Project Site is fully developed and currently contains four commercial/office and retail buildings. The Project Site is located in a highly developed area of Downtown Los Angeles. There is no significant vegetation on-site. No forested lands or protected vegetation exist on or in the vicinity of the Project Site. **Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur.**

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another non-agricultural use. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any "Farmland" category designated by the State of California. According to the "Los Angeles County Important Farmland 2018" map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[10] **Therefore, no impact would occur.**

Cumulative Impacts

No Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. Collectively, the projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forested land or conversion of forested land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Sites and the related projects' sites are not included in the Important Farmland category.[11] The Project Site and related projects' sites

[10] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018 South Los Angeles Map, published November 2020.*

[11] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018 South Los Angeles Map, published November 2020..*

are located in an urbanized area in the City and do not include any State-designated agricultural lands or forest uses. **Therefore, there would be no cumulative agricultural impacts.**

III. Air Quality

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

	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?	☐	☐	☒	☐

Regulatory Setting

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementing some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a

demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide ("CO"), nitrogen dioxide (NO_2), ozone (O_3), (particulate matter, 2.5 microns ($PM_{2.5}$), particulate matter, 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. USEPA has classified the Los Angeles County portion of the South Coast Air Basin ("Basin") as a nonattainment area for O_3, $PM_{2.5}$, and lead.

State

California Clean Air Act

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

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

California Air Toxics Program

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

Air Quality and Land Use Handbook: A Community Health Perspective

Released by CARB in 2005, the Air Quality and Land Use Handbook: A Community Health Perspective provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[12] The recommendations are advisory and should not necessarily be interpreted as defined "buffer zones"; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

Regional

South Coast Air Quality Management District

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

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

2022 Air Quality Management Plan

The 2022 Air Quality Management Plan (AQMP) was adopted on December 2, 2022, and represents the most updated regional blueprint for achieving federal air quality standards. It relies

[12] *California Air Resources Board, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005, accessed November 2021.*

on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and that continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. To this end, the RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs). Though these areas currently account for just 3 percent of total land in the SCAG region, they are projected to accommodate 51 percent of the region's future household growth and 60 percent of the region's future employment growth by 2040.[13] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local

City of Los Angeles General Plan Air Quality Element

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

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

[13] *HQTAs are defined by SCAG as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.*

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Criteria Pollutants

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

- **Ozone (O_3)** is a highly reactive and unstable gas that is formed when reactive organic gases (ROGs) and nitrogen oxides (NO_X), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight.

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

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

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

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

- **Nitrogen dioxide (NO_2)** is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel), as well as point sources, especially power plants. Of the seven types of NO_x compounds, NO_2 is the most abundant in the atmosphere.

  As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO_2 in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

- **SO_2** is a colorless, extremely irritating gas or liquid. SO_2 occurs as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfates (SO_4). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

  A few minutes exposure to low levels of SO_2 can result in airway constriction in some asthmatics. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties are observed after acute exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO_2.

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

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

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

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

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

Thresholds of Significance

Based on criteria set by the SCAQMD[14], a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels:

1. 75 lbs/day for VOC
2. 100 lbs/day for NO_X
3. 550 lbs/day for CO
4. 150 lbs/day for SO_X
5. 150 lbs/day for PM_{10}
6. 55 lbs/day for $PM_{2.5}$

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

1. 55 lbs/day for VOC
2. 55 lbs/day for NO_X
3. 550 lbs/day for CO
4. 150 lbs/day for SO_X
5. 150 lbs/day for PM_{10}
6. 55 lbs/day for $PM_{2.5}$

For purposes of determining whether the Project would exceed the applicable thresholds of significance for construction and operational air quality emissions, the project's emissions were modeled using the latest release of CalEEMod Version 2022.1, as recommended by the SCAQMD.

[14] *South Coast Air Quality Management District, Air Quality Significance Thresholds, Revision April 2019, accessed November 2021.*

Existing Conditions

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

IMPACT ANALYSIS

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

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

The Project is located within the Basin and, is therefore under the jurisdiction of the SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the SCAQMD on December 2, 2022 (“2022 AQMP”). The 2022 AQMP establishes a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. The 2022 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2022 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

In addition, SCAG approved their 2020 RTP/SCS that include transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2022 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2022 AQMP and the State Implementation Plan (SIP) for the South Coast Air Basin, are based on SCAG's 2020 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.

SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. With regard to air quality planning, SCAG has prepared and adopted the 2020–2045 RTP/SCS, which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. Determining whether or not a project exceeds SCAG's growth forecasts involves the evaluation of the following: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. As discussed in response to Checklist Question XIV(a), Population and Housing, the Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2020-2045 RTP/SCS to increase housing density within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project would concentrate new development and jobs within a half of a mile (walking distance) of several Metro bus lines that connect to all regions of the Los Angeles area. Additionally, the Project Site is served by two nearby Metro Stations within a half-mile: the Pico Station, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station, located approximately 0.4 mile southeast of the Project Site. Additionally, the Metro E Line railway immediately borders the Project Site to the west. Thus, the Project Site's location provides opportunities for employees, guests, and visitors to use public transit to reduce vehicle trips.

The Project Site is also located in a Transit Priority Area as defined by CEQA Sections 21099 and 21064.3. The California Department of Transportation, the U.S. Environmental Protection Agency, and the Metropolitan Transportation Commission have found that focusing development

in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption. The Project's mixed-use nature and close proximity to neighborhood-serving commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. **Thus, because the Project would be consistent with the growth projections and regional land use planning policies of the 2020-2045 RTP/SCS (as discussed in greater detail in response to Checklist Question XIII(b), Greenhouse Gas Emissions), the Project would not conflict with or obstruct implementation of the 2022 AQMP, and Project impacts would be less than significant.**

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. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regard to determining the significance of the Project incremental contribution to cumulative air quality emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

A project would conflict with the applicable AQMP if the project were to exceed the adopted thresholds of significance as adopted by the SCAQMD. The following analysis discusses and quantifies the Project's construction and operational air quality emissions and addresses the project's consistency with the SCAQMD's construction and operational thresholds of significance.

For purposes of the air quality modeling analysis, the following assumptions and inputs regarding the construction process were factored into the analysis:

Demolition/Site Clearing Phase

This phase would include the demolition and removal of the existing structures on-site. In addition, this phase may include the removal of seven street trees (five along Hope Street and two along Venice Boulevard), walls, fences, and associated debris. The demolition phase would be completed in approximately one month.

Grading and Excavation Phase

After the completion of demolition phase, the grading/excavation phase for the Project would occur for approximately one month and would involve excavating the Project Site for the basement level and the cut and fill of land to ensure the proper base and slope for the building foundations. The Project would require approximately 28,000 cubic yards (cy) of soil to be hauled off-site in order to build the building foundations.

Building Construction Phase

The building construction phase consists of above grade structures and is expected to occur for approximately 14 months. The building construction phase includes the construction of the proposed building, connection of utilities to the building, building foundations, basement walls, parking structure, laying irrigation for landscaping, and landscaping the Project Site. The two towers are proposed to be constructed using mat foundations. Construction activities for the proposed building foundation phase would include setting rebar, establishing plumbing and drainage connections, and pouring a concrete base.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately 12 months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishings and paint would be applied, and the installation of windows, doors, cabinetry, and appliances within the residential units and hotel guest rooms.

Paving and Landscaping Phase

The final phase of construction would entail paving the sidewalks and installing hardscape and landscaping features throughout the common areas. Paving also involves the laying of concrete or asphalt along the adjacent roads, setbacks, and paseo/walkway. This phase is expected to occur during the final four months of construction.

Haul Trucks

All construction and demolition debris would be recycled to the maximum extent feasible. For recycling efforts, Downtown Diversion (operated by Waste Management, Inc.) accepts construction and demolition waste for recycling and is located approximately 3 miles east of the Project Site (approximately 6 miles round trip). Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to either the Sunshine Canyon Landfill located approximately 30 miles north of the Project Site, or the Azusa Landfill located 25 miles east of the Project Site. Both facilities accept construction and demolition debris and inert waste from areas within the City of Los Angeles. For soil hauling, it is anticipated that soil exported from the Project Site would be deposited at a donor or receiving site, such as the Azusa Landfill. In the event a donor site is not identified at the time of excavation, soil would be transported to the Sunshine Canyon Landfill or the Azusa Landfill as described above.

Approval of a haul route will be required prior to construction. For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve

haul trucks with up to a 14 cubic yard hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The anticipated haul route would for transporting soil to the Sunshine Canyon Landfill would travel east on Venice Boulevard to Grand Avenue, south on Grand Avenue to 17th Street, and west on 17th Street to the I-10 Freeway on-ramp. Inbound haul trips would exit the I-10 Freeway at Olive Street, proceed north on Olive Street to 17th Street, and take 17th Street eastbound to the Project Site driveway on Hope Street. Construction and demolition haul trucks transporting material to either the Downtown Diversion facility or the Azusa Landfill would travel eastbound on Venice Boulevard to Grand Avenue, southbound on Grand Avenue to 18th Street, and east on 18th Street to the Los Angeles Street – I-10 Freeway on-ramp. Cement trucks from one of the ready-mix cement facilities in southeast Los Angeles would utilize the same eastbound route to the I-10 Freeway as described above, exiting on Alameda Street.

Hauling hours are anticipated to be 7:00 AM to 4:00 PM, Monday through Friday. The haul route for the Project will be subject to final approval by the Deputy Advisory Agency. Trucks are expected to be staged on-site or in the roadway, where parking and travel lanes would be temporarily closed.

Delivery Trucks

In addition to haul trucks, Project construction is also expected to generate equipment and delivery trucks during the building construction and architectural coatings phases. One example would be concrete delivery. Other materials could include plumbing supplies, electrical fixtures, and items used in furnishing the building. These materials would be delivered to the Project Site and stored on-site. These deliveries are expected to occur in variously sized vehicles including small delivery trucks to cement mixer trucks and 18-wheel trucks. Additionally, construction equipment would have to be delivered to the Project Site. This equipment could include cranes, bulldozers, excavators, and other large items of machinery. Most of the heavy equipment is expected to be transported to the Project Site on large trucks such as 18-wheelers or other similar vehicles.

Construction Worker Parking

During the site clearing phase and the first portion of the building construction, while the parking levels are under construction, construction employees would park in a parking lot nearby. The contractor would be responsible for securing off-site parking areas for construction personnel until parking can be accommodated on the Project Site.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 32 months with buildout anticipated in 2026. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in five main steps: (1) demolition/site clearing; (2) grading/excavation; (3) building construction; (4) finishing and architectural coatings; and (5) paving/landscaping. The entire construction phase includes the demolition of the existing structures, construction of the proposed buildings, connection of utilities to the buildings, and

landscaping the Project Site. The building construction phase would include two subphases: a foundations phase and the building construction phase. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG/VOC emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

As required by CEQA, the Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2022.1*) as recommended by the SCAQMD. Table 4.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required and regulated by SCAQMD Rule 403. The Project shall also comply with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. The construction activities would comply with Sections 2485 in Title 13 of the California Code of Regulations, wherein the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. Moreover, in accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

As shown in Table 4.1, construction-related daily emissions associated with the Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. **Therefore, compliance with regulatory compliance measure would ensure construction air quality emissions will not conflict with or obstruct implementation of the applicable air quality plan, and construction impacts would be less than significant**.

Table 4.1
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing						
On-Site Demolition	--	--	--	--	2.07	0.31
On-Site Off-Road Diesel Equipment	1.74	17.0	16.9	0.02	0.76	0.70
Off-Site Hauling/Vendor/Worker Trips	0.14	2.12	2.83	0.03	1.30	0.38
Total Emissions	***1.88***	***19.12***	***19.73***	***0.05***	***2.06***	***1.08***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	2.76	1.34
On-Site Off-Road Diesel Equipment	1.89	18.4	17.3	0.02	0.87	0.80
Off-Site Hauling/Vendor/Worker Trips	0.36	19.67	8.07	0.10	4.60	1.37
Total Emissions	***2.25***	***38.07***	***25.37***	***0.12***	***5.47***	***2.17***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Foundations						
On-Site Off-Road Diesel Equipment	1.19	9.81	10.2	0.02	0.41	0.38
Off-Site Hauling/Vendor/Worker Trips	1.81	10.4	31.34	0.04	5.78	1.46
Total Emissions	**3.00**	**20.21**	**41.54**	**0.06**	**6.19**	**1.84**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Building Construction						
On-Site Off-Road Diesel Equipment	1.19	9.81	10.2	0.02	0.41	0.38
Off-Site Hauling/Vendor/Worker Trips	1.66	5.57	28.62	0.02	5.08	1.25
Total Emissions	***2.85***	***15.38***	***38.82***	***0.04***	***5.49***	***1.63***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Finishing and Architectural Coating						
On-Site Architectural Coating	11.1	0.00	0.00	0.00	0.00	0.00
On-Site Off-Road Diesel Equipment	1.54	11.5	14.0	0.02	0.36	0.33
Off-Site Hauling/Vendor/Worker Trips	0.59	0.75	9.94	0.00	1.72	0.40
Total Emissions	***2.13***	***12.25***	***23.94***	***0.02***	***2.08***	***0.73***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Paving/Landscaping						
On-Site Off-Road Diesel Equipment	0.49	4.63	6.50	0.01	0.20	0.19
Off-Site Hauling/Vendor/Worker Trips	0.05	0.05	087	0.00	0.16	0.04
Total Emissions	***0.54***	***4.68***	***93.5***	***0.01***	***0.36***	***0.23***
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. The building construction phase would include two subphases: a foundations phase and the building construction phase. Calculation sheets are provided in Appendix A to this SCEA; numbers may not add up due to rounding.
Parker Environmental Consultants, 2023.

Operational Emissions

Existing Emissions

The Project Site is currently developed with 87,731 square feet of retail uses and 1,799 square feet of office uses, which serves as the existing conditions baseline. The existing use generates air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile sources, such as vehicle traffic traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod *Version 2022.1*). As shown in Table 4.2, motor vehicles are the primary source of air pollutant emissions associated with existing uses at the Project Site.

Table 4.2
Existing Daily Operational Emissions from Project Site

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile Sources	4.37	4.16	37.1	0.06	1.97	0.40
Area Sources	2.79	0.03	3.87	<0.005	0.01	0.01
Energy Sources	0.03	0.48	0.40	<0.005	0.04	0.04
Total Emissions	***7.18***	***4.67***	***41.4***	***0.06***	***2.01***	***0.44***
Wintertime (Non-Smog Season) Emissions						
Mobile Sources	4.27	4.55	34.5	0.06	1.97	0.40
Area Sources	2.14	--	--	--	--	--
Energy Sources	0.03	0.48	0.40	<0.005	0.04	0.04
Total Emissions	***6.44***	***5.02***	***34.9***	***0.06***	***2.00***	***0.44***

Note: Calculation worksheets are provided in Appendix A to this SCEA; numbers may not add up due to rounding.
Parker Environmental Consultants, 2023.

Project Emissions

The Project would result in the demolition of the existing structures and the development of a mixed-use hotel building with 300 guest rooms and 3,120 square feet of commercial, and a mixed-use multi-family residential building with 250 dwelling units and 10,000 square feet of commercial. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The Project would comply with all applicable SCAQMD rules and regulations pertaining to operational activities and emissions including but not limited to using specified fuel and fuel additive requirements for the operation of on-site stationary diesel engines (i.e., emergency generator) in accordance with CCR Title 17

Section 93115, limiting the volatile organic compound content of architectural coatings pursuant to SCAQMD Rule 1113, installing odor-reducing equipment in accordance with SCAQMD Rule 1138, and employing the use of best available control technology for new combustion sources such as boilers and water heaters (as required by the SCAQMD Regulation XIII, New Source Review).

The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod (*Version 2022.1*). The results of these calculations are presented in Table 4.3, Project Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Additionally, some criteria pollutants would be reduced with the Project, when compared to existing conditions. **Therefore, impacts associated with regional operational emissions from the Project would not conflict with or obstruct implementation of the applicable air quality plan and operational air quality impacts would be less than significant**.

Table 4.3
Project Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile Sources	9.79	7.03	79.0	0.18	6.38	1.22
Area Sources	14.5	0.27	29.7	<0.005	0.03	0.03
Energy Sources	0.08	1.42	1.19	0.01	0.11	0.11
Stationary Sources	1.64	7.34	4.18	0.01	0.24	0.24
Total Project Emissions	***26.0***	***16.1***	***114***	***0.20***	***6.76***	***1.61***
Less Existing Project Site Emissions	*(7.18)*	*(4.67)*	*(41.4)*	*(0.06)*	*(2.01)*	*(0.44)*
NET Project Emissions	**18.82**	**11.43**	**72.6**	**0.14**	**4.75**	**1.17**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Mobile Sources	9.64	7.70	73.3	0.17	6.38	1.22
Area Sources	10.6	--	--	--	--	--
Energy Sources	0.08	1.42	1.19	0.01	0.11	0.11
Stationary Sources	1.64	7.34	4.18	0.01	0.24	0.24
Total Project Emissions	***22.0***	***16.5***	***78.6***	***0.19***	***6.73***	***1.57***
Less Existing Project Site Emissions	*(6.44)*	*(5.02)*	*(34.9)*	*(0.06)*	*(2.00)*	*(0.44)*
NET Project Emissions	**15.56**	**11.48**	**43.7**	**0.13**	**4.73**	**1.13**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculation worksheets are provided in Appendix A to this SCEA.
Parker Environmental Consultants, 2023.

As discussed above, the Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. **Therefore, compliance with regulatory compliance measures would ensure the Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment, and impacts would be less than significant.**

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

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; childcare centers; and athletic facilities.[15]

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[16] apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: $NO_{x;}$ CO; $PM_{10;}$ and $PM_{2.5}$. 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 States ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA. For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles area. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project include the surrounding multi-family residences to the east, north, and northeast of the Project Site; and the Venice Hope Park, located immediately north. Figure 4.1, below, shows the nearest air quality sensitive receptors to the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82.02 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for

[15] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1, accessed November 2021.*

[16] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008, accessed November 2021.*

each construction phase. Sensitive receptors located further than 25 meters would be less impacted by localized emissions.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 4.4, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate two-acre site in SRA 1. These calculations reflect compliance with appropriate dust control measures as part of the Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. **Therefore, with implementation of the regulatory code compliance measures identified above, the Project would not expose sensitive receptors to substantial pollutant concentrations and localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.**

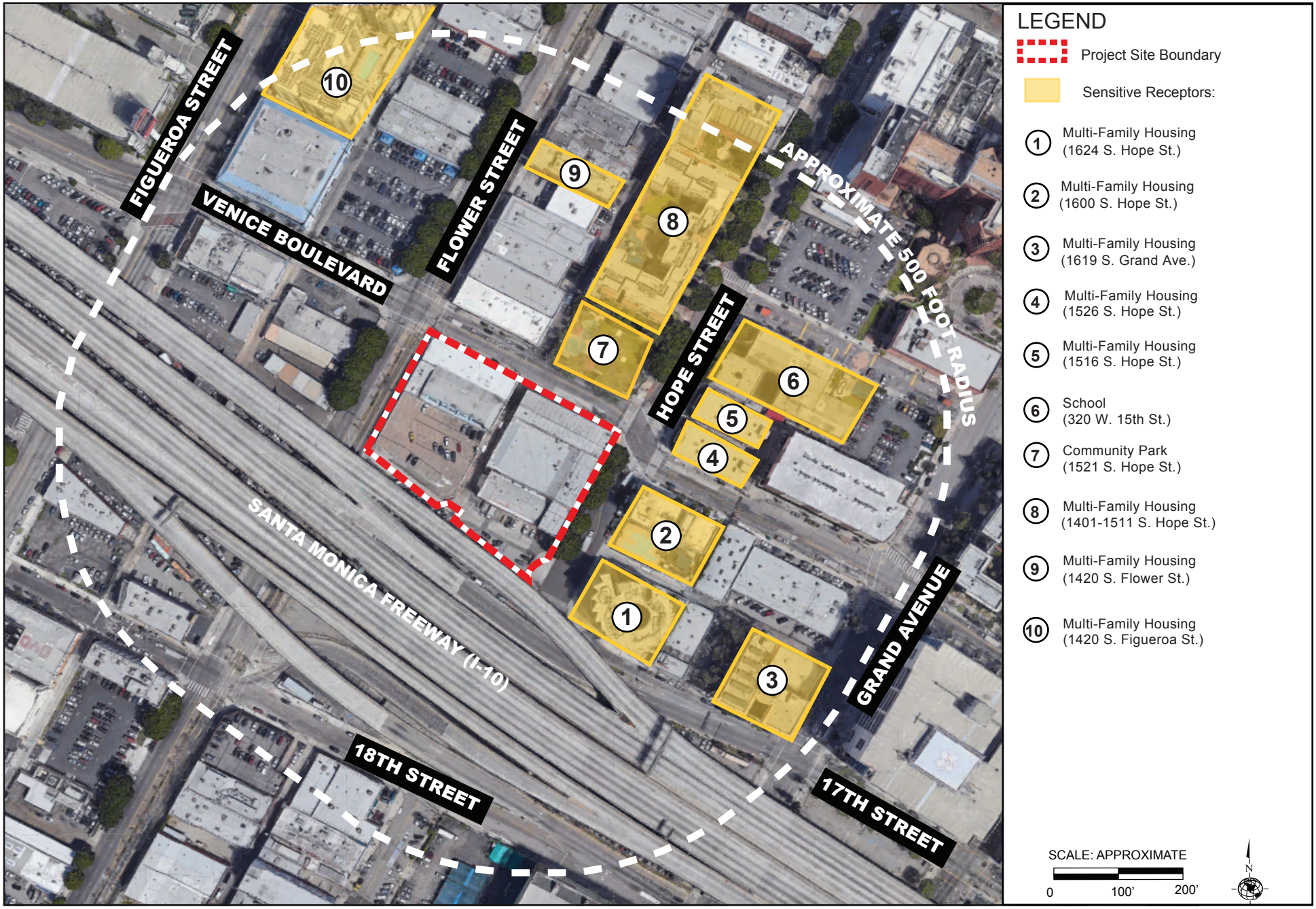
Table 4.4
Localized On-Site Peak Daily Construction Emissions

Construction Phase	Total On-site Emissions (Pounds per Day)			
	NO_x [a]	CO	PM_{10}	$PM_{2.5}$
Demolition	17.0	16.9	2.83	1.01
Excavation/Grading	18.4	17.3	3.63	2.14
Foundations	9.81	10.2	0.41	0.38
Building Construction	9.81	10.2	0.41	0.38
Architectural Coatings	11.5	14.0	0.36	0.33
Paving/Landscaping	4.63	6.50	0.20	0.19
SCAQMD Localized Thresholds [b]	**108**	**1,048**	**8**	**5**
Potentially Significant Impact?	*No*	*No*	*No*	*No*

[a] *The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 1 for a Project Site of 2 acres.*

[b] *The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*

Source: CalEEMod 2022.1, Calculation sheets are provided in Appendix A to this SCEA.
Parker Environmental Consultants, 2023.



Source: Google Earth, Aerial View, 2018; Parker Environmental Consultants.

Figure 4.1
Air Quality Sensitive Receptors

Localized Operational Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The South Coast Air Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). The Basin has been in attainment for CO since 2007, and CO levels in the Source Receptor Area (SRA) 1 remain substantially below the federal and state standards. The maximum CO levels during 2016 were recorded at 1.9 ppm (one-hour average) and 1.4 ppm (eight-hour average), compared to the thresholds of 20 ppm (one-hour average) and 9.0 (eight-hour average).[17] In its 2003 AQMP, the SCAQMD conducted CO hot-spot analyses at the four worst-case intersections in the Air Basin. The 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 approximately 100,000 vehicles per day. The data provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at all four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue. When added to the existing [2003] background CO concentrations, the worst-case CO levels in the Basin was estimated to be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average), respectively, which is below the CO thresholds of significance for both the CAAQS and NAAQS. The AQMP therefore concluded that because the Basin is in attainment for CO, and the studied congested intersections do not exceed state thresholds, CO hotspots are less than significant under extreme conditions. Comparatively, recent ambient CO levels in 2016 are substantially lower than they were in 2013. The volume of traffic at the closest study intersections, Intersection #9, Flower Street & Venice Boulevard and Intersection #13, Hope Street & Venice Boulevard are substantially lower than the studied intersections in the 2003 AQMP study.[18] Therefore, it is reasonable to conclude that the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. **Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. Localized operational emissions would be less than significant and no further analysis for CO hotspots is warranted**.

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[17] *South Coast Air Quality Management District, 2022 Air Quality Management Plan, accessed March 2023.*

[18] *Based on the peak hour data provided in Appendix F.2 to this SCEA, the ADT at the Flower Street and Venice Boulevard intersection is estimated to be approximately 29,280 and approximately 13,140 daily trips at the intersection of Flower Street and Venice Boulevard as compared to 100,000 ADT at the four study intersections in the 2003 AQMP.*

Toxic Air Contaminants (TAC)

Construction TACs

The Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) associated with trucks and heavy equipment. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. The construction activities associated with the Project would be similar in scale and intensity to other development projects in the City and are subject to existing regulations and laws relating to diesel emissions. The construction period would occur over an approximately 32-month period, with phases of the highest use of heavy diesel equipment occurring only during the first 8 months. DPM poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive receptors. As such, TAC emissions would occur for a relatively short duration during construction. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (32 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Project would not result in a localized significant impact. While the SCAQMD has not published guidance directly related to quantitatively assessing health risk impacts associated with construction activities, the construction equipment to be utilized during construction would be required comply with CARB's "In-Use Off-Road Diesel Fueled Fleets Regulation." This regulation establishes target emission rates for off-road vehicles and requires fleet owners to demonstrate compliance with annual reporting requirements. It also requires equipment operators to turn off their engines when idling.

Diesel particulate matter (DPM), which is a recognized toxic air contaminant and the primary source of TACs generated by diesel construction equipment, is a subset of both PM_{10} and $PM_{2.5}$, (i.e., approximately 94 percent of these particles are less than 2.5 microns in diameter).[19] As such, the Project's PM_{10} and $PM_{2.5}$ emissions are an indication of the magnitude of DPM emissions. As noted in Tables 4.3 and 4.4, above, the Project's PM_{10} and $PM_{2.5}$ emissions would be below the regional and localized thresholds of significance, respectively. **As such, the Project would result in a less than significant impact related to construction TACs and further analysis is not warranted.**

[19] *Scientific Review Panel Findings, Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant Report, May 27, 1998, accessed November 2021.*

Operational TACs

As for exposure of sensitive receptors to toxic air contaminants during project operations, the SCAQMD recommends that health risk assessments be conducted for emitting facilities that require an AQMD operating permit and for projects that have the potential to generate substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[20] Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The Project consists of a mixed-use development containing hotel guest rooms, multi-family residential, and retail/commercial uses that would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. **Therefore, impacts associated with the release of toxic air contaminants would be less than significant.**

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase. Further, the Project would be required to install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138 to control odors from any operational activities within the proposed commercial uses. With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

During the construction phase, activities associated with the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Such odors could be a temporary source of nuisance to adjacent uses. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD

[20] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions, December 2002, accessed November 2021.*

Rules, no construction activities or materials that would create a significant level of objectionable odors are proposed. **Therefore, impacts associated with objectionable odors would be less than significant.**

Cumulative Impacts

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

AQMP Consistency

Cumulative development can affect implementation of the 2022 AQMP. The 2022 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2022 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2022 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. **Thus, cumulative impacts related to conformance with the 2022 AQMP would be less than significant.**

Construction and Operational Emissions

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

Odor Impacts

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at the Project and each related project include the use of architectural

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

IV. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

IMPACT ANALYSIS

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

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a highly urbanized area in the City of Los Angeles and is improved with four office/retail buildings. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Vegetation on the Project Site is limited to five street trees (five Indian laurel fig) in the public right-of-way along Hope Street and two street trees (one fern pine and one Chinese juniper) in the public right-of-way along Venice Boulevard.[21] It is anticipated that all of these trees would be removed and replaced. The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. The Protected Tree Report determined that none of these trees in the public right-of-way are designated protected trees. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. **Therefore, 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.**

[21] *The Tree Resource, Protected Tree Report, 1600 S. Flower St. & 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018 (Appendix H to this SCEA).*

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?

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

c) 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?

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat, as defined by Section 404 of the Clean Water Act. The Project Site is entirely developed with impermeable surfaces and does not contain any wetlands or natural drainage channels. Further, the Project Site is located in a developed area within the City of Los Angeles. Neither the Project Site nor the surrounding area contain any wetlands or riparian habitat. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see Checklist Question IV(b), above). **Therefore, the Project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means and no impact to riparian or wetland habitats would occur.**

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?

No Impact. A project would normally result in a significant impact on biological resources if it results in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in a heavily urbanized area of Downtown Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites on the Project Site or in the Project Site vicinity.

The Project Site does not contain any aquatic habitat that would support migratory fish. species As discussed above, vegetation on the Project Site is limited to seven street trees in the public right-of-way adjacent to the Project Site, which could potentially support migratory bird species on a transitory basis. The removal and replacement of these trees would be subject to the review and approval of the approval of the Board of Public Works, Urban Forestry Division. While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees has the potential to impact nesting bird species if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) *(Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20)* and Section 3503 of the California Department of Fish and Game Code. The Project would take necessary steps to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code. **Thus, with adherence this regulatory compliance measure, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species. Therefore, no impact would occur.**

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)?

No Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As stated above, the Project Site is improved with four office/retail buildings. There are no protected tree species located on the Project Site.[22] Therefore, the Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. However, all street trees in the public right-of-way are expected to be removed as a result of the Project. All non-protected trees on the Project Site's public right-of-way shall be removed and replaced to the satisfaction of the Urban Forestry Division. The number, type and size of replacement trees to be provided in the public right-of-way shall be provided per the current Urban Forestry Division standards and to the satisfaction of the Department of Public Works. Further, the Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibits take of all birds and their active nests including raptors and other migratory non-game birds. **Thus, the Project would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur from the loss of street trees.**

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. A significant impact would occur if a project would be inconsistent with mapping or

[22] *The Tree Resource, Protected Tree Report, 1600 S. Flower St. & 1611 S. Hope St., Los Angeles, CA 90015, May 9, 2018 (Appendix H to this SCEA).*

policies in any conservation plans of the types cited. No locally designated natural communities are known to occur on or adjacent to the Project Site. **Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.**

Cumulative Impacts

No Impact. The Project would have no impact upon biological resources with regulatory compliance and mitigation measures. Development of the Project in combination with the related projects would not impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Moreover, development of the related projects is expected to occur in accordance with adopted plans and regulations. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address biological resources. **Thus, no cumulative impacts to 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 (see Public Resources Cod, Ch. 1.75 §5097.98, and Health and Safety Code §7050.5(b))??	☐	☐	☒	☐

IMPACT ANALYSIS

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

Less Than Significant Impact. A significant impact may occur if a project would disturb historic resources, which presently exist within the Project Site. *State CEQA Guidelines* Section 15064.5

defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[23]

According to the Historic Resource Assessment, located in Appendix I.1 of this SCEA, the Project Site is currently developed with four commercial buildings. Originally located on nine separate parcels that have since been combined, the buildings date from circa 1917 to 1960. The two earliest buildings (Building A, 1601-1611 South Hope Street, and Building C, 1600-1606 South Flower Street) were constructed under separate ownership as an automobile parts sales (Building A) and bathhouse and drugstore/restaurant (Building C). Building A was purchased by Electrical Equipment Company in 1935 and later expanded with construction of Building B. The company further expanded in the 1960s with purchase of Building C and construction of Building D.

The City of Los Angeles' Office of Historic Resources recently completed a citywide historic resource survey known as SurveyLA. As part of the survey, historic context statements and survey reports relevant to study of the Project Site were prepared, including for industrial development in the City of Los Angeles, and for the Central City Community Plan Area. None of the buildings at the Project Site were identified as potential historical resources in either SurveyLA document. In addition, none of the buildings at the Project Site have ever been previously surveyed for historic or architectural significance; the Historic Resource Assessment is the first known assessment of the Project Site.

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

[23] *CEQA Guidelines, Section 15064.5(b)(1).*

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of the national, State, or local community's history and cultural heritage.

Building A, 1601-1611 South Hope Street, was evaluated for its association with its first tenant for whom the building was constructed, Western Auto Electric Corporation, and the early history of the automobile in Los Angeles, specifically automobile repair, service and parts manufacturing. As established in Historic Resource Assessment, the history of the automobile industry is an important historic context in Los Angeles. The Project Site represents an early example of a building type that supplied auto parts and "illustrate[s] the evolution of the car repair shop as a significant commercial building type related to the automobile and Los Angeles' flourishing car culture." SurveyLA provides the following eligibility standards for this property type:

- Was originally designed and historically used to repair and provide parts for the automobile
- Demonstrates convenient automobile access from the street
- Is an excellent, early, or rare remaining example of the property type
- Contains design and site layout features that reflect the influence of, and adaptation to, the automobile
- Was constructed during the period of significance [1920-1970]

While Building A does indeed meet most of the above eligibility standards, it has been so altered over the years, it is unrecognizable from how it appeared when it was used as an auto-related business and lacks sufficient integrity to convey its significance (described more fully below). Therefore, Building A is not eligible under Criterion 1.

Building A was purchased in 1937 by Electrical Equipment Company, later expanding with construction of Building B in 1946, acquisition of Building C and construction of Building D in the 1960s. Electrical Equipment Company occupied the Project Site for over 30 years and distributed Zenith radios, washing machines, refrigerators and Columbia Brunswick and Vocalion records. None of these items were manufactured at the Project Site. As a distribution company, Electrical Equipment Company reflected the growth of consumer products within households, but evidence does not show that the company contributed to that growth or otherwise changed how these products were sold. Therefore, Building A is not eligible under Criterion 1 for its association with Electrical Equipment Company.

Building B, 1617 South Hope Street, was constructed in 1946 as an expansion of Electrical Equipment Company. The history of Building B parallels the history of the company in the post-World War II era. As noted above, Electrical Equipment Company expanded to distribution of TV consoles, kitchen appliances and soft water solutions during this period. The building appears to have primarily served as warehouse space with a few offices on the second floor. Similar to Building A, Electrical Equipment Company reflected the growth of consumer products within households, but evidence does not show that the company contributed to that growth or otherwise

changed how these products were sold. Therefore, Building B is not eligible under Criterion 1 for its association with Electrical Equipment Company.

Building C, 1600-1606 South Flower Street, was constructed in 1917 as a bath house (indoor swimming pool) with stores along Venice Boulevard, specifically a drugstore and later restaurant on the corner of South Flower Street and Venice Boulevard. The Wilkinson College of Swimming occupied the space from 1917 when the building was constructed, for almost a decade. Neither the Wilkinson College of Swimming, nor any of the drugstores/restaurants that occupied the space appear to have made any significant contributions to the broad patters of history or cultural heritage. Therefore, Building C does not appear eligible under Criterion 1.

Building D, 1616 South Flower Street, was constructed in 1960 as additional warehouse and parking for Electrical Equipment Company. As previously discussed, Electrical Equipment Company has not been found to be significant under Criterion 1. Therefore, Building D is not eligible under Criterion 1 for its association with Electrical Equipment Company. Therefore, the Project Site is not eligible under Criterion 1.

Criterion 2: Is associated with the lives of persons important in national, State, or local history.

Although several individuals have been associated with the subject properties, none rise to the level required to warrant consideration under Criterion 2: association with the lives of persons important in the past. Ray Thomas, owner of Electrical Equipment Company, which occupied the Building A, and later B, C, and D, for over 30 years, was associated with the Project Site longer than any other person. While Ray Thomas garnered a small degree of publicity for compact radios in the mid-1920s, this was a decade or more before Electrical Equipment Company occupied the Project Site. In addition, while Thomas may have gained a modicum of notoriety in Los Angeles for a brief period, as an individual, he does not appear to have had an impact on the widespread popularity of radio. As discussed further under Criterion 3, below, none of the other buildings are strongly associated with any particular individual's illustrious careers that are important in national, state or local history; nor do any other buildings appear to be significant for association with the lives of persons in the past. Therefore, the Project Site is not eligible under Criterion 2.

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.

Building A, designed by Richard King in a Commercial Vernacular style with elements of Classical Revival style, does not appear eligible under Criterion 3. Richard King was a notable Los Angeles architect. He worked on a wide variety of properties throughout his career, including residential, commercial, institutional, and industrial. Several of his notable buildings are extant, including the Riviera Apartment House, Hollywood Professional Building, and Sparkletts Bottling Plant. In addition to not being among his notable work, Building A has been altered numerous times and no longer reflects its original architectural design. Therefore, Building A is not eligible under Criterion 3.

Building B was designed by the architectural firm Kaufmann, Lippincott & Eggers. Although the firm existed for only two years, the principals were all individually notable architects, specifically Gordon Kaufmann, a particularly important Los Angeles architect. However, Building B is not expressive of any of their illustrious careers. Designed with elements of Late Moderne style focused on the façade, specifically the horizontal grouping of windows with a projecting frame and two columns of glass block, the building design is otherwise unremarkable and pales in comparison with other examples of Kaufmann's work in a similar style. Therefore, Building B is not eligible under Criterion 3.

Building C was designed by the relatively unknown architect Woodbury C. Pennell. As described in the Historic Resource Assessment, Woodbury C. Pennell does not appear to have been an architect of note and Building C does not represent the work of an important creative individual. Building C appears to have been substantially altered, most notably a new façade in 1930. Building C does not embody distinctive characteristics of a type, period, region, or method of construction, nor does it possess high artistic values and therefore it is not eligible under Criterion 3.

Building D was constructed as a warehouse and appears as a functional building that possesses no artistic values. It is a common example of its type and does not embody distinctive characteristics of a type, period, region, or method of construction. Therefore, Building D is not eligible under Criterion 3.

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

As previously discussed under Criterion 1, above, none of the Project Site's four buildings (Buildings A to D) were found to be eligible for listing in the National or California Registers nor were they found eligible for local designation under any criteria. SurveyLA findings for the Central City CPA identified a number of properties that appear eligible as auto related commercial properties that retain integrity, but Building A was not one that was identified. Building A was purchased in 1937 by Electrical Equipment Company, later expanding with construction of Building B in 1946, acquisition of Building C and construction of Building D in the 1960s. Electrical Equipment Company occupied the Project Site for over 30 years and distributed Zenith radios, washing machines, refrigerators and Columbia Brunswick and Vocalion records. None of these items were manufactured at the Project Site. As a distribution company, Electrical Equipment Company reflected the growth of consumer products within households, but evidence does not show that the company contributed to that growth or otherwise changed how these products were sold. Building B and D were constructed as an expansion of Electrical Equipment Company. Similar to Building A, Electrical Equipment Company reflected the growth of consumer products within households, but evidence does not show that the company contributed to that growth or otherwise changed how these products were sold. Building C was constructed in 1917 and occupied with stores along Venice Boulevard and by The Wilkinson College of Swimming for almost a decade. Neither the Wilkinson College of Swimming, nor any of the drugstores/restaurants that occupied the space appear to have made any significant contributions

to the broad patterns of history or cultural heritage. Therefore, there is no information to suggest that the four buildings are specifically associated with any important historical events nor yield important information in prehistory or history.

Additionally, as discussed under Criteria 3 above, none of the buildings are associated with any particular creative individual's illustrious careers that are important in national, state or local history; nor do any other buildings appear to be significant for association with the lives of persons in the past. The Project Site is not associated with significant contribution to history nor representative of historic artistic value. Therefore, the Project Site does not yield any important information regarding the history or prehistory of the nation, State, County, or community; therefore, it is not eligible under Criterion 4.

Historic District

As noted above, a HPOZ "is any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural, or aesthetic significance." The Project Site is not part of a distinguishable unified neighborhood or area. As noted above, the surrounding neighborhood contains a mix of building uses, including residential, commercial, and industrial, all dominated by the presence of the I-10 Freeway immediately south of the Project Site. In addition to no unifying use, there is no unifying period of construction for the surrounding buildings. There is no historic or architectural sense of time and place. While the four building were owned and used by Electrical Equipment Company by the 1960s, this company has not been shown to be a particularly significant company. Therefore, there is no potential National or California Register historic district or HPOZ to which the Project Site could contribute.

Integrity

For a property to be eligible for designation at the state or national level, it must meet at least one eligibility criterion listed above and retain sufficient integrity to convey that historic significance. As mentioned in the Historic Resource Assessment, integrity is defined as physical and visual characteristics necessary to convey its significance. Evaluation of integrity is founded on "an understanding of a property's physical features and how they relate to its significance." The seven aspects of integrity are Location, Design, Setting, Materials, Workmanship, Feeling, and Association. As noted above, Building A appears significant as an early example of a building type that supplied auto parts. None of the other three buildings at the Project Site appear to meet any significance criteria. However, Building A has been altered numerous times and can no longer convey its significance. The following describes how the Project Site does or does not meet each of the seven aspects of integrity:

Location: Building A retains integrity of location as it has not been moved.

Design: Building A does not retain integrity of design. A historic rendering and historic photographs show how the building appeared when it was constructed. As noted above, the building historically had an ornate fenestration pattern set within each bay on both the first and second floors,

and automobile access from the street. Nearly all bays have been infilled and the building no longer has automobile access. The parapet has been removed, as well as most terra cotta ornament. In addition, the building has a new main entrance along the east elevation.

Setting: Building A does not retain integrity of setting. With construction of the I-10 freeway in 1960 and recent new construction to the east and north, the setting of Building A as seen in historic aerial photographs appears quite different from how it appeared in the 1930s. Historically, Building A appears to have been located nearby similarly-scaled light industrial buildings interspersed with older, multi-family apartments.

Materials: With a loss of nearly all fenestration, automobile access, and terra-cotta ornamentation, Building A lacks integrity of material.

Workmanship: Loss of materials, specifically terra cotta ornamentation, represents a loss of workmanship.

Feeling: With a loss automobile access from the street, Building A lacks integrity of feeling and cannot convey its original function nor association with the automobile.

Association: Like integrity of feeling, with loss of automobile access from the street, Building A does not provide any indication of the past as an automobile-related facility. Therefore, the Project Site has lost integrity of association.

In conclusion, while Building A, 1601-1611 South Hope Street appears to be significant as an early example of a building type that supplied auto parts, the building has been substantially altered, lacks sufficient integrity to convey significance, and is therefore not eligible for listing in the National or California Registers or locally as a local HCM. None of the other three buildings located on the Project Site were found to be eligible for listing in the National or California Registers nor were they found eligible for local designation under any criteria. None of the four buildings appear to be part of any potential or designated historic district. **Therefore, the Project Site is not a historical resource under CEQA. As such, the Project would not cause an adverse change in the significance of a historic resource, and a less than significant impact would occur.**

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources which presently exist within the project site. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. For purposes of assessing the project's potential impacts upon archaeological resources, the following analysis summarizes the

findings of the *Ground Penetrating Radar Investigation Results and Archaeological Resources Recommendations for the South Park Towers Project, Los Angeles, California* (Archaeological Resources and Ground Investigation), prepared by Dudek, dated December 14, 2018. (See Appendix I.2 to this SCEA).

Background Research

SCCIC Records Search

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) on October 22, 2018 for the Project Site and surrounding 0.5-mile search buffer. Results of the CHRIS records search indicated that 39 previous cultural resource studies have been conducted within the records search area between 1979 and 2017 (Table 1 of the Archaeological Resources and Ground Investigation). Of these studies, one site (LA-13239) intersects the Project Site. LA-13239 is a record associated with the "Zanja Madre", which is known to be Los Angeles' original water conveyance system consisting of interconnected ditches known as "zanjas" that were established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. A detailed description and historical overview of the Zanja Madre is provided in Appendix I.2 to this SCEA. However, see the summary of the results of the ground penetrating radar analysis summarized below. LA-13239 is summarized below.

LA-13239 (Gust 2017)

Report LA-13239 presents the mapped linear boundary of the Zanja Madre that was completed by Cogstone Resource Management, Inc. in 2017 and includes the listing on the California Historic Property Data File. The maps within the report illustrate the possible alignments associated with the historic-period Zanja Madre water conveyance network throughout the City of Los Angeles (see Attachment D of Appendix I.2 to this SCEA). Moreover, the map depicts a segment of the zanja network (identified as Zanja No. 8) as running northeast/southwest through the center of the Project Site. While the Cogstone study provides a valuable review of available documentation pertaining to this historic water conveyance feature, the level of existing information does not provide substantial or otherwise confirmed evidence indicating that this feature is present within the Project Site. Specific restrictions to the accuracy of the Archaeological Resources and Ground Investigation were presented by the age and generalized quality of the records representing the route of the feature, the absence of physical evidence confirming a specific route of Zanja No. 8 in the vicinity of the Project Site, and the degree of urbanization that has occurred in the more than 100 years since it was built.

Sixteen (16) previously recorded cultural resources have also been documented within a 0.5-mile of the Project Site. None of these intersect the Project Site. All 16 resources identified during the records search are historic-era buildings. As analyzed under Tribal Cultural Resources, (see Response to Checklist Question XVIII(a), Tribal Cultural Resources, below) no cultural resources of Native American origin are documented within the Project Site or surrounding 0.5-mile search area of files held at the SCCIC.

Native American Correspondence

NAHC Sacred Lands File Search

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on October 10, 2018. The NAHC emailed a response on October 16, 2018, which indicated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. The NAHC provided the contact information of ten individuals and/or entities with whom to contact along with the SLF search results. Documents related to the NAHC SLF search are included in Attachment C of the Archaeological Resources and Ground Investigation (Appendix I.2 to this SCEA).

Historic Map and Aerial Research

Dudek consulted historic aerials, accessed through University of California Santa Barbara's Map and Imagery Laboratory, Sanborn Maps, accessed through the Los Angeles Public Library, and historical maps accessed through the Los Angeles Public Library, the Huntington Map Library, and the David Rumsey Map Collection, to understand the development of the Project Site and impacts to the historic zanja system. The zanja network was Los Angeles' original irrigation system, and the network is thought to have run throughout the city in various branches, predominantly along major roads.

The 1884 map, prepared by a United States Surveyor Fred Eaton, shows that at this time the Project Site had not yet been subdivided but was located in an area that had been parceled and sold out to various individuals. A segment of the zanja network is seen running northeast-southwest through this area. This offshoot was Zanja No. 8. The H.J. Stevenson 1887 map, depicting the proposed sewers of Los Angeles, shows the Project Site within a now subdivided area, yet still undeveloped area. There is no reference to the zanja on this map; however, the *Arroyo de los Reyes* is mapped running throughout the area. This map excludes references to Zanja No. 8, or any other zanja segments. The earliest Sanborn Map, from 1888, covering the Project Site and vicinity shows that development at this time consisted only of a few small domestic residences in the general area. The actual Project Site was undeveloped at this time. Zanja No. 8 is not depicted on this map. Zanja No. 8 is not mapped on the 1906 map, or any other later maps showing the Project Site. Historical aerials consulted dating from 1928 onwards indicate that from the mid twentieth century until present day, the Project Site and immediate vicinity underwent substantial changes, mainly due to the construction of the I-10. No segments of Zanja No. 8 were visible on the historical aerials consulted.

Ground Penetrating Radar (GPR) Investigations

Using ground penetrating radar (GPR) equipment and specialized software capable of mapping and identifying below grade anomalies, Dudek staff were able to create 2-dimensional vertical

images radargrams and 3-dimensional time-slice images for the study area. GPR investigations did not result in any subsurface readings that would be consistent with the documented route or typical physical characteristics of zanja segments. Based on these results, and in consideration of the severity of past impacts to subsurface soils that would have occurred during construction of the large buildings already occupying the majority of the Project Site, it appears unlikely that any extant zanja segments or other intact cultural resources are present that could be impacted as a result of Project implementation. While unlikely, it is still possible that unanticipated archaeological deposits or features are present at subsurface levels. Management recommendations for unanticipated archaeological resources and human remains during campus construction activities are provided below.

Summary of Findings

No archaeological resources were identified within the Project Site or immediate vicinity as a result the CHRIS records search or through the NAHC SLF search. A segment of the zanja system, Zanja No. 8, has been mapped to have run generally northeast-southwest through the Project Site. Archival research has indicated that Zanja No. 8 was built in 1857 by Orzo W. Childs and by 1888 was made of 16-inch cement pipe. Sources consulted do not indicate whether Zanja No. 8 was incorporated into the city's water infrastructure in the early twentieth century, which would have supported its preservation.

GPR investigations did not result in any subsurface readings that would be consistent with the documented route or typical physical characteristics of zanja segments. Based on these results, and in consideration of the severity of past impacts to subsurface soils that would have occurred during construction of the large buildings already occupying the majority of the Project Site, it appears unlikely that any extant zanja segments or other intact cultural resources are present that could be impacted as a result of Project implementation. While unlikely, it is still possible that unanticipated archaeological deposits or features are present at subsurface levels. Management recommendations to reduce potential impacts to unanticipated archaeological resources and human remains during campus construction activities are provided below.

Unanticipated Archaeological Resources

All construction crew should be alerted to the potential of encountering archaeological material. In the event that archaeological resources (sites, features, artifacts, or fossilized material) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified specialist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether an additional study is warranted. Prehistoric archaeological deposits may be indicated by the presence of discolored or dark soil, fire-affected material, concentrations of fragmented or whole freshwater bivalves shell, burned or complete bone, non-local lithic materials, or the characteristic observed to be atypical of the surrounding area. Common prehistoric artifacts may include modified or battered lithic materials; lithic or bone tools that appeared to have been used for chopping, drilling, or grinding; projectile points; fired clay ceramics or non-functional items; and other items. Historic-age deposits are often indicated by

the presence of glass bottles and shards, ceramic material, building or domestic refuse, ferrous metal, or old features such as concrete foundations or privies. The GPR study indicated that there is no extant remnant of a zanja segment. However, if there were to be such a segment of the zanja system in this area would likely be indicated by soil change and/or cement remnants. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted. As there are no known recorded archaeological resources within the Project Site, the potential to encounter such resources is considered low. **Therefore, compliance with the provisions of 14 CCR 15064.5(f) and PRC Section 21082 would ensure that environmental impacts associated with the inadvertent discovery of significant archaeological resources would be reduced to a less than significant level.**

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

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

Unanticipated Human Remains

No known human burials have been identified on the Project Site or its vicinity. While unlikely, it is possible that unknown human remains could be present at subsurface levels, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. Based on the Archaeological Resource Assessment (see Appendix C contained within Appendix I.2 to this SCEA), in accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the Project Site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the Project Site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains. **Compliance with regulatory compliance measures would ensure that if any such remains are found during construction of the Project, they would be handled according to the proper regulations, and impacts to human remains would be less than significant.**

Cumulative Impacts

Less Than Significant Impact. Development of the Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed

on a site-by-site basis. Each of the related projects would be subject to discretionary City approval and project-specific CEQA review that would address cultural resources. The analysis of the Project's impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate mitigation. **Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.**

VI. Energy

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

Regulatory Setting

Federal

Energy Independence and Security Act of 2007

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

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

a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[24]

Corporate Average Fuel Economy Standards

Established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 CFR Parts 531 and 533) reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and the United States Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by USEPA and NHTSA. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[25] USEPA and NHTSA have also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[26]

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 (EPCA) is a United States Act of Congress that responded to the 1973 oil crisis by creating a comprehensive approach to federal energy policy. The primary goals of EPCA are to increase energy production and supply, reduce energy demand, provide energy efficiency, and give the executive branch additional powers to respond to disruptions in energy supply. Most notably, EPCA established the Strategic Petroleum Reserve,

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[24] *A "green job," as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

[25] *United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, 2011.*

[26] *U.S. EPA, NHTSA, Federal Register Volume 81, No. 206, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles – Phase 2, October 25, 2016,* https://www.govinfo.gov/content/pkg/FR-2016-10-25/pdf/2016-21203.pdf*. Accessed February 2022.*

the Energy Conservation Program for Consumer Products, and Corporate Average Fuel Economy regulations.

State

Senate Bill 1389

Senate Bill (SB) 1389 (Public Resources Code Sections 25300–25323; SB 1389) requires the California Energy Commission (CEC) to prepare a biennial integrated energy policy report that assesses major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code Section 25301[a]). The 2017 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California including energy efficiency, strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan, building energy efficiency standards, the impact of drought on California's energy system, achieving 50 percent renewables by 2030, the California Energy Demand Forecast, the Natural Gas Outlook, the Transportation Energy Demand Forecast, Alternative and Renewable Fuel and Vehicle Technology Program benefits updates, update on electricity infrastructure in Southern California, an update on trends in California's sources of crude oil, an update on California's nuclear plants, and other energy issues.

Renewables Portfolio Standards

First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030.[27] SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent; and (2) to double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, former Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and

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[27] *California Public Utilities Commission, California Renewables Portfolio Standard (RPS), 2018, website https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard#:~:text=The%20Renewables%20Portfolio%20Standard%20(RPS,the%20state's%20load%2Dserving%20entities.&text=The%20California%20Energy%20Commission%20verifies%20RPS%20claims, accessed February 2022.*

enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.[28]

California Building Standards

California Building Energy Efficiency Standards (Title 24, Part 6)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[29] The 2022 Title 24 standards continue to improve upon the 2019 Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings which include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1-2017 national standards.[30]

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality.[31] The 2022 CALGreen Code improves upon the 2019 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2022 CALGreen Code went into effect on January 1, 2023.

California Assembly Bill 1493 (AB 1493, Pavley)

In response to the transportation sector accounting for more than half of California's carbon dioxide (CO_2) emissions, Assembly Bill (AB) 1493 (commonly referred to as CARB's Pavley regulations), enacted on July 22, 2002, requires CARB to set greenhouse gas (GHG) emission standards for new passenger vehicles, light duty trucks, and other vehicles manufactured in and after 2009 whose primary use is non-commercial personal transportation. Phase I of the legislation established standards for model years 2009–2016 and Phase II established standards

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[28] *California Public Utilities Commission, RPS Program Overview, 2018 website: https://www.cpuc.ca.gov/RPS_Overview/, accessed February 2022.*

[29] *California Energy Commission, 2022 Building Energy Efficiency Standards, 2022, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency. Accessed May 2023.*

[30] *California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018, https://www.energy.ca.gov/publications/2022/2022-building-energy-efficiency-standards-residential-and-nonresidential. Accessed May 2023.*

[31] *California Building Standards Commission, Guide to the 2022 California Green Building Standards Code Nonresidential, 2022.*

for model years 2017-2025.[32],[33] As discussed In subsection (1) *Federal*, above, in March 2020, the U.S. DOT and the U.S. EPA issued the SAFE Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.

California Air Resources Board

Scoping Plan

AB 32 required California Air Resources Board (CARB) to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC section 38561 (h)). There have been three previous Scoping Plans (2008, 2014, and 2017). Previous plans have focused on specific greenhouse gas reduction targets for the industrial, energy, and transportation sectors – first to meet 1990 levels by 2020, then to meet the more aggressive target of 40 percent below 1990 levels by 2030. This plan, addressing recent legislation and direction from Governor Newsom, extends and expands upon these earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. This plan also takes the unprecedented step of adding carbon neutrality as a science-based guide to touchtone for California's climate work. The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the State's natural and working lands and using a variety of mechanical approaches.

The 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Specifically, this plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.

[32] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, https://www.arb.ca.gov/cc/ccms/ccms.htm. Accessed February 2022.*

[33] *United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, 2012.*

- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands (NWL) to the state's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

This Scoping Plan draws on a decade and a half of proven successes and additional new approaches to provide a balanced and aggressive course of effective actions to achieve carbon neutrality in 2045, if not before, in addition to the 2030 goal.

Advanced Clean Car Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations.[34] The program requires a greater number of zero-emission vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and the Zero-Emissions Vehicle regulations (ZEV) to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025. In particular, implementation of the ZEV and PHEV regulations reduce transportation fuel consumption by increasing the number of vehicles that are partially or fully electric-powered. Effective November 26, 2019, the federal SAFE Vehicles Rule Part One: One National Program withdraws the California waiver for the GHG and ZEV programs under section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Cars and ZEV mandates.

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

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485). The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are

[34] *California Air Resources Board, Clean Car Standards – Pavley, Assembly Bill 1493, https://ww2.arb.ca.gov/californias-greenhouse-gas-vehicle-emission-standards-under-assembly-bill-1493-2002-pavley, last reviewed January 11, 2017. Accessed February 2022*.

licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

In-Use Off-Road Diesel Fueled Fleets Regulation

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

SB 375 (Sustainable Communities Strategy)

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associate with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

Regional

Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

SB 375 requires each MPO to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and

policies, would reduce vehicle miles traveled from automobiles and light duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted on September 3, 2020, is the current RTP/SCS and is an update to the 2016-2040 RTP/SCS.

The 2020-2045 RTP/SCS focuses on the continued efforts of the previous RTP/SCS plans for an integrated approach in transportation and land use strategies in development of the SCAG region through horizon year 2045. The 2020-2045 RTP/SCS projects that the SCAG region will meet the GHG per capita reduction targets established for the SCAG region of 8 percent by 2020 and 19 percent by 2035. Additionally, its implementation is projected to reduce VMT per capita for the year 2045 by 4.1 percent compared to baseline conditions for the year. Rooted in the 2008 and 2012 RTP/SCS plans, the 2020-2045 RTP/SCS includes "Core Vision" that centers on maintaining and better managing the transportation network for moving people and goods while expanding mobility choices by location housing, jobs, and transit closer together, and increasing investments in transit and complete streets.

Local

Green New Deal

In April 2019, Mayor Eric Garcetti released the Green New Deal, a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.[35] L.A.s Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015 and therefore replaces and supersedes the Sustainable City pLAn.[36] It augments, expands, and elaborates in more detail L.A.'s vision for a sustainable future and it tackles the climate emergency with accelerated targets and new aggressive goals.

Within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 British Thermal Units (BTU)/sq. ft. in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.

[35] *City of Los Angeles. LA's Green New Deal, 2019.*

[36] *City of Los Angeles, Sustainable City pLAn, 2015.*

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 pounds (lbs.) of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

Green Building Code

Chapter IX of the Los Angeles Municipal Code (LAMC) is referred to as the "Los Angeles Green Building Code," which incorporates by reference portions of the CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes mandatory measures for newly constructed nonresidential and high-rise residential buildings. The Los Angeles Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency.

City of Los Angeles Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[37] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation

[37] *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016 and adopted by City Council on September 7, 2016.*

for how the City's residents interact with their streets. The Mobility Plan includes five main goals that define the City's high-level mobility priorities:

(1) Safety First;
(2) World Class Infrastructure;
(3) Access for All Angelenos;
(4) Collaboration, Communication, and Informed Choices; and
(5) Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals.

All Electric Buildings Ordinance (Ordinance 187,714)

Effective January 23, 2023, the City approved an ordinance requiring that all new buildings to be constructed all-electric. This ordinance leads a pathway to end the expansion of local natural gas infrastructure. New buildings are prohibited from having combustion equipment, gas piping, or fuel gas for purposes such as space and water heating, cooking appliances and drying clothes. Electricity must be the sole source of energy for all lighting, appliances and equipment. New buildings of all types are covered by this mandate, with some exceptions of specific uses (i.e., cooking in commercial facilities).

Existing Conditions

Electricity

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

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

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

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

According to LADWP's 2017 Power SLTRP, LADWP has a net dependable generation capacity greater than 7,531 MW.[38] On August 31, 2017, LADWP's power system experienced a record instantaneous peak demand of 6,432 MW.[39] In 2020, approximately 34 percent of LADWP's 2019 electricity mix was from renewable sources, which is similar to the 32 percent statewide percentage of electricity purchases from renewable sources.[40] The annual electricity sale to customers for the 2016-2017 fiscal year was approximately 22,878 million GWh.[41]

Natural Gas

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

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

SoCalGas, along with five other California utility providers released the 2022 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2035. This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[42]

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[38] *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), accessed November 2021.*

[39] *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), accessed November 2021.*

[40] *California Energy Commission, Utility Annual Content Labels for Los Angeles Department of Water and Power, accessed November 2021.*

[41] *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), accessed November 2021.*

[42] *California Gas and Electric Utilities, 2022 California Gas Report, accessed May 2023.*

Gas supply available to SoCalGas from California sources averaged 69 million cubic feet (cf)/day in 2021.[43] SoCalGas projects total natural gas demand to decrease at an annual rate of 1 percent per year from 2020 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs and SB 350. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' projection for natural gas also decreases. SoCalGas' storage fields attain a combined theoretical storage working inventory capacity of 137 billion cf. Based on the 2022 California Gas Report, the CEC estimates that current natural gas consumption within the SoCalGas' planning area is 2,660 million cf/day in 2021.[44]

Transportation Energy

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

Though California's population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.6 billion gallons in 2017 to between 12.1 billion and 12.6 billion gallons in 2030, a 19-percent to 22-percent reduction. This decline comes in response to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles. The CEC projects that the amount of alternative fuel (e.g., electricity, natural gas, hydrogen, ethanol) consumed within the transportation sector will increase in the future.[45]

Currently, the Project Site is developed with approximately 26,710 square feet of retail commercial land uses. It is estimated that the trips associated with the operation of the existing commercial uses on-site consume a total of approximately 86,955 gallons of gasoline per year.[46]

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43 *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed May 2023.*

44 *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed May 2023.*

45 *CEC, Revised Transportation Energy Demand Forecast, 2018-2030, accessed November 2021.*

46 *Refer to Fuel Consumption Calculations included as Appendix G in this SCEA.*

IMPACT ANALYSIS

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

Less Than Significant Impact. The following provides a discussion of six criteria contained in Appendix F of the CEQA Guidelines to help determine whether the Project would result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

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

Construction

Energy would be consumed during the construction phases of the Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Project would require the export of soil, asphalt, and building debris from the Project Site during the demolition/site clearing phase. The excavation phase of the Project would generate additional haul trips and diesel fuel would be consumed by heavy equipment during the excavation, grading, and construction process. Construction worker travel to and from the Project Site would result in the additional consumption of petroleum-based fuel during the construction period. In addition to petroleum-based fuel, construction of the Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase. Construction equipment and activities do not generally involve the use of natural gas.

About 19.6 pounds of CO_2 are produced from burning a gallon of gasoline that does not contain fuel ethanol. Most of the retail gasoline now sold in the United States (more than 95 percent) contains about 10 percent fuel ethanol by volume. A motor gasoline blend of 10 percent fuel ethanol and 90 percent gasoline (by volume) is known as E10 gasoline. Based on carbon dioxide emission factors for transportation fuels published by the U.S. Energy Information Administration (EIA), the amount of diesel and petroleum-based gasoline (E10) consumed can be estimated based on CO_2 emissions. Burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2, and burning one gallon of petroleum-based gasoline with 10 percent ethanol content (E10) produces approximately 18.9 pounds of CO_2 emissions.[47,48] Based on the U.S. EIA fuel consumption factors identified above, and the Project's estimated "Total CO_2" emissions presented in Appendix A of this SCEA, Air Quality Modeling and Greenhouse Gas Emissions Worksheets, it is estimated that the construction of the Project would consume a total of approximately 236,134 gallons of fuel, including approximately 132,787 gallons of diesel fuel and

[47] *U.S. Energy Information Administration, Today in Energy, accessed November 2021.*

[48] *U.S. Energy Information Administration, Today in Energy, accessed November 2021.*

103,347 gallons of gasoline.[49] For purposes of comparison, in 2021, approximately 523,779 thousand barrels of crude oil (approximately 22 billion gallons) were supplied to California refineries.[50] Based on the CEC's Retail Fuel Outlet Annual Reporting Results, approximately 2.77 billion gallons of gasoline fuel and 0.30 billion gallons of diesel fuel was sold in Los Angeles County in 2020.[51] Therefore construction of the Project would account for less than 0.01 percent of the annual gasoline and diesel fuel supply to the State and Los Angeles County. Furthermore, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours, not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. Due to the relatively short duration of the construction process, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. As such, demand for transportation energy during construction would not cause wasteful, inefficient, and unnecessary use of energy.

With respect to electricity usage, construction of the Project would generate an electricity demand for the treatment and conveyance of water for dust suppression activities during the excavation and grading phase in order to comply with SCAQMD Rule 403. Although this demand is generated off site and associated with system infrastructure, it is estimated that the Project's use of watering the Project Site would generate a demand of 2,643 kWh of electricity, or approximately 51 kWh per day throughout the building demolition and grading phases when watering activities would occur.[52] Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and would represent a small fraction of the net annual operational electricity demand of the existing uses. The existing electricity demand at the Project Site is approximately 1,415,158 kWh/year. As compared to the existing electricity demand, the amount of annual electricity use during construction would be approximately 2,643 kWh/year, which represents approximately 0.2 percent of the existing annual electricity use at the Project Site. As such, the energy requirements and electricity usage during construction would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

As discussed above, the energy demands during construction would be typical of construction projects for projects of this size and would not **cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.**

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49 *Refer to Energy Consumption Worksheets included as Appendix G in this SCEA.*

50 *California Energy Commission, Oil Supply Sources to California Refineries, website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries, accessed March 2022.*

51 *California Energy Commission, California Retail Fuel Outlet Annual Reporting Results, website: https://www.energy.ca.gov/media/3874, accessed March 2022.*

52 *Water application rate = 3,020 gal/acre/day per Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition). Electricity consumption per water usage = 0.009727 kWhr/gallon on 1.73 acre site for 52 days (26 days demolition and 26 days of grading/excavation.)*

Operation

Electricity

Based on correspondence with LADWP, there are two overhead 4.8-kV circuits that run along Venice Boulevard and Pembroke Lane adjacent to the Project Site. There are no 34.5 kV circuits in proximity to the Project Site.[53] The Project would require on-site transformers and may require underground line extensions on public streets. The projected increase in electrical demand due to the Project would not have an adverse impact on its electrical system. As such, electric service is available and would be provided to the development. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies.

As shown in Table 4.5, below, the estimated net increase in electricity consumption by the Project would be approximately 2,524,928 kWh per year. As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, revised and effective January 1, 2023, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Project's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. As noted in the correspondence with LADWP (see Appendix N.6 of this SCEA), the estimated power requirements for the Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.[54] Furthermore, as noted in Section XIV, Population and Housing, the Project would not exceed SCAG's growth projections for the City of Los Angeles and thus would not exceed the total load growth projections as estimated by LADWP.

[53] *Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, South Park Towers Project, December 21, 2021 (See Appendix N.6 to this SCEA).*

[54] *Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, South Park Towers Project, page 3, December 21, 2021 (See Appendix N.6 to this SCEA).*

Table 4.5
Estimated Electricity Consumption by the Project

Land Use	Size	Total (Kilowatt hours/year) [a]
Existing Uses (to be removed)		
Office	1,779 sf	1,397,445
Retail	87,731 sf	17,713
Total Existing Electricity Consumption:		**1,415,158**
Project		
Residential Uses	250 du	822,802
Hotel	300 rooms	2,313,213
Medical Office	10,000 sf	159,287
Restaurant	3,120 sf	101,619
Enclosed Parking Structure	288 spaces	543,165
Project Total Electricity Consumption:		**3,940,086**
Less Existing Electricity Consumption:		*(1,415,158)*
Net Electricity Consumption:		**2,524,928**

Notes: du: dwelling unit; sf: square feet; kWh = kilowatt-hour
[a] *Existing and proposed electricity usage was estimated using CalEEMod Version 2022.1. See Appendix A, Air Quality Modeling and Greenhouse Gas Emissions Worksheets.*
Source: Parker Environmental Consultants, 2023.

As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code, which include implementing energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY STAR-rated appliances for residential dwelling units, low-flow water features, and energy efficient mechanical heating and ventilation systems. Thus, the Project's residential units and commercial spaces would incorporate code-required energy conservation features. **As such, with compliance with regulations and policies aimed at reducing overall electricity usage, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of electricity-producing resources, during project operation.**

Natural Gas

As mentioned previously, natural gas for the Project Site is provided by SoCalGas. Gas supply available to SoCalGas from California sources averaged 87 million cubic feet (cf)/day in 2020. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas's projection for natural gas demand also decreases. Based on the 2022 Supplemental California Gas Report, the CEC

estimates that current natural gas consumption within the SoCalGas' planning area is 2,660 million cf/day in 2021.[55] SoCalGas' natural gas storage fields have a combined theoretical storage working inventory capacity of approximately 137 Bcf.[56] As shown in Table 4.6, below, operation of the Project would generate a net increase of 3,448,369 cubic feet of natural gas per year (cf/year), which represents a very small fraction of one percent (i.e., 0.14%) of the SoCalGas's existing natural gas storage capacity.

Table 4.6
Estimated Natural Gas Consumption by the Project

Land Use	Size	Total (kBTU/year) [a]	Total (cubic feet/year) [a]
Existing Conditions (to be removed)			
Office	1,779 sf	1,762,679	1,727,425
Retail	87,731 sf	8,760	8,585
Total Existing Natural Gas Consumption:		**1,771,439**	**1,736,010**
Proposed Project			
Residential Uses	250 du	0	0
Hotel	300 rooms	4,793,708	4,697,834
Medical Office	10,000 sf	200,919	196,901
Restaurant	3,120 sf	295,556	289,645
Enclosed Parking Structure	288 spaces	0	0
Total Project Site Natural Gas Consumption:		**5,290,183**	**5,184,379**
Less Existing Natural Gas Consumption:		*(1,771,439)*	*(1,736,010)*
Total Net Increase in Natural Gas Consumption		**3,518,744**	**3,448,369**

Notes: du: dwelling unit; sf: square feet
[a] *Existing and proposed natural gas demand was estimated using the CalEEMod model. See Appendix C, Greenhouse Gas Emissions. For purposes of this discussion all units calculated in k/BTU in the CalEEMod model were converted to cubic feet (cf) using the following conversation rate: 1 kBTU = 0.98 cf.*
Source: Parker Environmental Consultants, 2023.

As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2023, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Most importantly, compliance with the City's All-Electric Ordinance would further reduce natural gas consumption in the Project's building systems. **As such, with compliance with regulations aimed at reducing overall natural gas usage, the Project would not result in potentially significant environmental**

[55] *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed September 2022.*
[56] *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed September 2022.*

impact due to wasteful, inefficient, or unnecessary consumption of natural gas resources, during project operation.

Fossil Fuels

In 2021, approximately 523,779 thousand barrels of crude oil (approximately 22 billion gallons) were supplied to California refineries.[57] Based on the CEC's Retail Fuel Outlet Annual Reporting Results, approximately 3.06 billion gallons of gasoline fuel was sold in Los Angeles County in 2021.[58] Approximately 459,700 gallons of gasoline fuel would be utilized by mobile sources annually during operation of the Project.[59] Assuming the same supply of crude oil is provided to California and Los Angeles County in 2026 (buildout year of Project), the Project's estimated net increase in operational demand for 459,700 gallons of gasoline per year estimated would represent approximately 0.02 percent of estimated 3.06 billion gallons of gasoline fuel sales for the Los Angeles County.

Furthermore, the Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas, and oil. The Project Site is located in the Central City Community Plan area, which is highly connected to the regional transit network in the Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including nearby railways, are also present. The Project Site is served by several bus lines and two adjacent Metro rail lines within walking distance. Due to its proximity to public transit, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

Additionally, as an infill development, the Project would incorporate a mix of residential, hotel, and commercial uses, that include retail, restaurant, and other neighborhood serving commercial. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Transportation Impact Analysis (see Appendix F.1 of this SCEA), because the commercial component of the Project would be primarily serving the proposed development and surrounding project area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area. The reduction in vehicle trips, due to the Project's mixed-use programming and the Project Site's location in a transit-oriented district, would therefore decrease the Project's reliance on fossil

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[57] *California Energy Commission, Oil Supply Sources to California Refineries, website: http://www.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html, accessed November 2022.*

[58] *Source: California Energy Commission, California Retail Fuel Outlet Annual Reporting Results, website: https://www.energy.ca.gov/media/3874, accessed November 2022.*

[59] *In order to quantify the amount of gasoline fuel utilized for the Project's operation, the annual VMT and the total annual CO_2e emissions calculated in CalEEMod were converted to estimate the gallons of gasoline consumed. Refer to Energy Consumption Worksheets included as Appendix G in this SCEA.*

fuels. Additionally, as discussed in Checklist Question XVII(b), Transportation, the Project is expected to have a less-than-significant VMT impact based on the residential component. The work VMT per employee was determined to have a less than significant impact with mitigation. Therefore, the Project would result in a less than significant increase in VMT with mitigation implemented to reduce VMT. As such, the energy requirements and energy use of the Project as related to petroleum-based fuels during operation would not cause wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant. **Therefore, with incorporation of the features identified above, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and impacts would be less than significant.**

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

Electricity

Construction of the Project would generate a demand for the treatment and conveyance of water for dust suppression activities during the demolition and excavation/grading phases in compliance with SCAQMD Rule 403. As mentioned under Criteria 1 above, it is estimated that the Project's use of watering the Project Site would generate a demand of 2,643 kWh of electricity, or approximately 51 kWh per day throughout the building demolition and grading phases when watering activities would occur.[60] In comparison, the LADWP estimates approximately 23,537 GWh of electricity sales in the fiscal year of 2025-2026 (Project operational year). Based on the assumption above, the Project would represent less than 0.0001 percent of the LADWP electricity sales. Therefore, Project electricity consumption during operational activities would have a negligible effect on LADWP's electricity supplies.

With respect to operational electricity demand, correspondence with LADWP (See Appendix N.6) states that electric service is available to serve the Project and would be provided in accordance with LADWP's Rules Governing Water and Electric Service. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Project would be part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power Strategic Long-Term Resource Plan incorporates the estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs.[61] Therefore, the Project would not result in an increase in demand for electricity that exceeds

[60] *Water application rate = 3,020 gal/acre/day per Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition). Electricity consumption per water usage = 0.009727 kWhr/gallon on 1.73 acre site for 52 days (26 days demolition and 26 days of grading/excavation.)*

[61] *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resources Plan (SLTRP), accessed November 2021.*

available supply, and construction and operations of the Project would thus not affect local or regional electricity supplies or requirements for additional capacity and impacts would be less than significant.

Natural Gas

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

With respect to operations, SoCalGas manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g., pressure betterments, natural gas supplies) would need to be initiated to solve problems. It is anticipated that the SoCalGas would be able to meet the natural gas demands of the Project. However, consistent with standard practice, a detailed natural gas survey of equipment would be completed prior to construction to ensure that the current infrastructure can adequately sustain the demand for the Project. Since the Project is located in an area already served by existing natural gas infrastructure, and the Project's anticipated use of natural gas would be limited to kitchen appliances in the Project's public use areas and potentially emergency back-up generators pursuant to the All-Electric Ordinance, the Project would not require extensive infrastructure improvements to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Project. The Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. "Hook-up" disruptions along sidewalks or streets cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature. Therefore, the Project would not adversely affect local and regional natural gas supplies or generate a demand for additional capacity during construction or operation. Impacts would be less than significant.

Transportation Energy

In 2021, approximately 523,779 thousand barrels of crude oil (approximately 22 billion gallons) were supplied to California refineries.[62] Based on the CEC's Retail Fuel Outlet Annual Reporting Results, approximately 3.01 billion gallons of gasoline fuel and 0.30 billion gallons of diesel fuel was sold in Los Angeles County in 2020.[63]

In order to quantify the amount of diesel and gasoline fuel utilized for the Project's construction, the total CO_2 emissions from each of the construction phases and activities calculated in the CalEEMod worksheets for the Project were utilized to estimate the gallons of diesel and gasoline

[62] *California Energy Commission, Oil Supply Sources to California Refineries, website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries, accessed March 2022.*

[63] *California Energy Commission, California Retail Fuel Outlet Annual Reporting Results, website: https://www.energy.ca.gov/media/3874, accessed March 2022.*

consumed (Appendix G, Energy Conservation Worksheets). Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, the effects of the Project on local and regional energy supplies and on requirements for additional capacity would not be significant. This estimate is conservative since it is assumed that California's reliance on oil would be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles. As such, the gasoline consumption associated with the Project's vehicle trips during both construction and operation would be a negligible amount of oil compared to the total amount of oil supplied to California and sold in Los Angeles County, and impacts on regional and local supplies would be less than significant.

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

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

With regard to peak electricity load conditions, the 2018 Power SLTRP stated the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.[64] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2026-2027 (closest forecasted year to project operational year), the base case peak demand for the power grid is 6,129 MW. Under peak conditions, the Project would consume approximately 2,524,928 kWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to approximately 576 kW (peak demand assuming 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid base peak load of 6,129 MW for 2026-2027, based on the assumption above, the Project would represent approximately 0.009 percent of the LADWP base peak load conditions. Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

With regard to peak day natural gas demand, the 2022 California Gas Report assumed the yearly natural gas usage only occurs during three months (90 days) of the year, during the winter months. This results in a monthly peak natural gas usage of 5,184,379 cf per year or approximately 57,604 cf per day (conservatively assuming natural gas usage would only occur during the winter months). In comparison to the CEC extreme peak day demand of 2,691 million cf for 2026, based on the assumption above, the Project would represent 0.002 percent of SoCalGas' forecasted extreme peak day demand. Therefore, Project natural gas demand during operational activities would have a negligible effect on peak demands of the natural gas supplies.

The electricity and natural gas energy supplies would be sufficient to serve the Project's peak energy demand. Thus, the Project's electricity and natural gas demand during operational

[64] *LADWP, 2018 Retail Electric Sales and Demand Forecast, accessed November 2021.*

activities would have a negligible effect on demand during peak and base load periods of the power grid and on the natural gas supplies, and impacts would be less than significant.

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

Construction

During construction, trucks and equipment operated on-site would comply with SCAQMD's anti-idling regulations and CARB's In-Use Off-Road Diesel-Fueled Fleets regulation. Compliance with the anti-idling and diesel-fueled fleet regulations would directly reduce the amount of diesel fuel consumed during the construction phase. Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act, which mandates standards for electrical motors and equipment. Therefore, the Project's construction activities would comply with existing energy standards, and impacts would be less than significant.

Operation

The Project would be required to comply with 2022 Title 24 requirements, 2022 CalGreen requirements, and the L.A. Green Building Code. Therefore, the Project would comply with energy standards with respect to electricity and natural gas usage. With respect to transportation energy, it should be noted that the fuel use for vehicle transportation is conservatively based on an estimate of the Project's total annual VMTs and current fuel use estimated in mpg for gasoline and diesel. Future fuel use in the region would actually be lower as a result of CAFE standards and CARB's Advanced Clean Cars Program, which would further increase fuel economy and reduce demands for transportation fuel. Therefore, the Project would comply with all existing construction and operational energy standards that are applicable to the Project, and impacts would be less than significant.

Criteria 5) The effects of the Project on energy resources.

Electricity Resources

As previously described, LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Construction of the Project would generate a temporary demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase. However, it is anticipated that electricity demands during construction would be well below the existing electricity demands of the current uses on the Project Site, and construction activities would not necessitate additional energy facilities or distribution infrastructure.

In accordance with SB 350, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. LADWP has increased its renewable energy percentage from 3 percent in 2003 to 32 percent in 2018. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and

wind will provide most of the new renewable electric generation in the years ahead. The Project would adhere to the required building code standards, such as 2022 Title 24 standards and 2023 L.A. Green Building Code, to ensure energy efficiency within the proposed structures. Compliance with energy standards are expected to result in more efficient use of electricity in future years. The LADWP's 2017 Power SLTRP identifies adequate resources (renewables, natural gas, coal) that are consistent with the RPS mandates to support future generation capacity. As such, the Project would not impact electricity resources during either construction or operation, and impacts would be less than significant. Due to the Project Site's location, other types of on-site renewable energy sources would not be feasible on-site as there are no local sources of energy from the following sources: biodiesel, biomass, hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, methane, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Therefore, the Project would not affect electrical resources during operation or construction, and impacts would be less than significant.

Natural Gas Resources

Sources of Southern California's natural gas are primarily obtained from western United States and Canada with a small portion from in-state. Construction activities for the Project, including the construction of new buildings and facilities, would not involve the consumption of natural gas. Compliance with energy standards are expected to result in more efficient use of natural gas in future years. Therefore, the Project would not affect natural gas resources during operation or construction, and impacts would be less than significant.

Transportation Energy Resources

As mentioned previously, approximately 485,454 thousand barrels of crude oil (approximately 20.4 billion gallons) were supplied to California refineries in 2020.[65] At a local level, approximately 3.01 billion gallons of gasoline fuel and 0.30 billion gallons of diesel fuel was sold in Los Angeles County in 2020.[66] Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. This estimate is conservative since it is based on current fuel efficiency standards for diesel and gasoline engines. California's future reliance on transportation fuel would be further reduced in future years since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles under CAFE standards and CARB's Advanced Clean Cars Program. As such, the Project's transportation energy consumption during construction and operation would not

[65] *California Energy Commission, Oil Supply Sources to California Refineries, accessed November 2021.*
[66] *California Energy Commission, California Retail Fuel Outlet Annual Reporting Results, accessed May 2023.*

substantially affect California's petroleum-based transportation fuel supplies or Los Angeles County's fuel sales, and impacts would be less than significant.

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

As discussed in the Checklist Question XVII(a), Transportation, of this SCEA, the Project would promote trip reductions and alternative modes of transportation. The Project Site is located within a HQTA, as defined by the SCAG. The Project's mix of residential and commercial/retail uses, close proximity to numerous transit options, and location near a broad mix of existing land uses would result in a net reduction in daily trips and VMT. As such, the Project would promote alternate modes of transportation and reduce its reliance on transportation energy, and impacts would be less than significant.

As demonstrated in the analysis of the six criteria discussed above, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's demands on electricity, natural gas, and transportation energy 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. Additionally, the Project would comply with all energy conservation standards applicable to the Project. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards**. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of energy during the construction and operation, and impacts with respect to energy consumption would be less than significant.**

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

Less Than Significant Impact.

Electricity

California's Renewable Portfolio Standards (RPS)

First established in 2002 under Senate Bill 1078, California's Renewable Portfolio Standards (RPS) require retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[67] In 2015, SB 350 increased the State's standards to require a 50% RPS by 2030. SB 350 includes interim annual RPS targets with three-year compliance periods and requires 65% of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 (de León, 2018) was signed into law,

[67] *CPUC, California Renewables Portfolio Standard (RPS) Program, https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed, December 2, 2021.*

which again increases the RPS to 60% by 2030 and requires all the state's electricity to come from carbon-free resources by 2045.[68]

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2022 Standards will continue to improve upon the 2019 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2022 Standards is January 1, 2023.[69] The Energy Efficiency Standards are a specific response to the mandates of AB 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Project includes energy efficiency components to conserve energy, which are detailed below.

City of Los Angeles Department of Water and Power - Power Strategic Long-Term Resource Plan (SLTRP)

Starting in 2017, the City's Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which increases LADWP's planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmental responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Project would derive its electricity from the LADWP, the Project's energy demands would primarily be derived from renewable energy sources.

The Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code and the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2023, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project Sites energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. As the Project is consistent with the regional growth projections of the City of Los Angeles, the estimated power

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[68] *CPUC, California Renewables Portfolio Standard (RPS) Program, https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps, accessed, December 2, 2021.*

[69] *California Energy Commission, 2022 Building Energy Efficiency Standards, accessed May 2023.*

requirement for the Project Site is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. Moreover, LADWP plans to increase renewable energy sources to meet the City's goals for a clean energy future. Specifically, the goals include supplying 55 percent of power retail sales from renewable energy resources by 2025, 80 percent by 2036, and 100 percent by 2045, as well as achieve a carbon neutral power system by 2050.[70]

Natural Gas

SoCalGas, a subsidiary of Sempra Energy (the nation's largest natural gas supplier), provides natural gas to the City of Los Angeles through existing gas mains located under the streets. SoCalGas, along with five other California utility providers released the 2022 California Gas Report, presenting a forecast of natural gas supplies and requirements for California through the year 2035. This report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.[71]

In 2021, gas supplies available to SoCalGas from California sources averaged 69 million cubic feet per day (cf/day).[72] Based on the 2022 California Gas Report, SoCalGas projects total natural gas demand to decrease at an annual rate of 1 percent per year from 2020 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs and SB 350. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, a decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI).[73] Thus, with the natural gas consumption becoming more efficient and decreasing, the SoCalGas' projection for natural gas also decreases. SoCalGas' storage fields attain a combined theoretical storage working inventory capacity of 137 billion cf. Based on the 2022 California Gas Report, the CEC estimates that current natural gas consumption within

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[70] *LADWP, Renewable Energy Program, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-renewableenergypolicy?_adf.ctrl-state=134gl3ib8i_42&_afrLoop=1177302159454723, accessed December 2021.*

[71] *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed May 2023.*

[72] *California Gas and Electric Utilities, 2022 California Gas Report, website: https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf, accessed May 2023.*

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

the SoCalGas' planning area is 2,660 million cf/day in 2021.

As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the L.A. Green Building Code which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code, and the City's All-Electric Ordinance, which requires all electric buildings throughout the City with limited exceptions for cooking appliances in public use areas and emergency back-up power equipment. Specifically, the addition of more electric based appliances, and implementation of energy efficient insulation features in buildings would reduce natural gas demand for the Project. As such, the Project's natural gas usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Transportation Energy

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

The Project would include several conservation measures to decrease reliance on fossil fuels. As discussed previously the Project Site is an infill site within a Transit Priority Area as defined by CEQA. The Project Site is also located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. In addition to its location in a Transit Priority Area, the Project would provide on-site bicycle parking pursuant to LAMC Section 12.21 A.16. Additionally, Sections 99.04.106.4.4 and 99.04.106.4.2, 30 percent of the total number of parking spaces provided will be electric vehicle charging spaces (EVCS) capable of supporting future (e.g., EVCS-ready) and 25 percent of the total parking spaces provided will consist of EVCS spaces, which would promote the use of zero and low emissions vehicles. Compliance with the LAMC would ensure that the Project does not conflict with the 2020-2045 RTP/SCS goals to reduce the region's reliance on fossil fuels.

Therefore, with incorporation of the features identified above, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects within the City of Los Angeles would further increase demand for electricity, natural, and fossil fuels.

Electricity

The Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost-effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. **Cumulative impacts to electricity service would therefore be less than significant.**

Natural Gas

Development of the Project in conjunction with the related projects would further increase regional demands for natural gas resources. However, implementation of the City's All Electric Ordinance, which requires new construction to consist of all electric buildings citywide, with limited exceptions for cooking appliances in public use areas and emergency back-up power systems, would reduce the future demand for natural gas in new construction. As mentioned above, the SoCalGas allocated approximately 112.5 billion cubic feet to residential, small industrial and commercial customers. As a public utility provider, the SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the SoCalGas's ability to serve each related project. As such, it is anticipated the related projects and the Project would be accommodated by SoCalGas. **Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.**

Fossil Fuels

The Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration

(NHTSA) and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within a Transit Priority Area, which is defined as being within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. **As such, the Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.**

VII. Geology and Soils

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
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?	☐	☐	☒	☐

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

- Geotechnical Investigation, Proposed High-Rise Development "1600 South Flower Street" 1600-1623 South Flower Street, 1601-1611 South Hope Street, 426 & 440 W. Venice Boulevard, Los Angeles, California (Geotechnical Investigation), prepared by Geocon West, Inc., dated March 19, 2018.
- Soils Report Approval Letter (Log # 102587), issued by the Grading Division of the Department of Building and Safety, dated April 11, 2018.
- Ground Penetrating Radar Investigation Results and Archaeological Resources Recommendations for the South Park Towers Project, Los Angeles, California, prepared by Dudek, December 14, 2018.

The Geotechnical Investigation, along with the Soils Report Approval Letter, is included as Appendix B of this SCEA. The Ground Penetrating Radar Investigation Results and Archaeological Resources Recommendations is provided in Appendix I.2 of this SCEA.

IMPACT ANALYSIS

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

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

Less Than Significant Impact. A significant impact may occur if the Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on criteria established by the California Division of Mines and Geology (CDMG), now called California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive for most purposes, with the exception of design of some critical structures.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface fault rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture at magnitudes higher than 6.0 cannot be precluded.

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially active” faults utilizing the same aging criteria as that used by the CGS, described above. However, established State policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years.

Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on the research of available literature described in the Geotechnical Investigation, no known active or potentially active surface faults underlie the Project Site. In addition, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. The closest surface trace of an active fault to the Project Site is the Hollywood Fault located approximately 4.9 miles to the north. Other nearby active faults include the Newport-Inglewood Fault Zone, the Raymond Fault, the Verdugo Fault, and the Santa Monica Fault, located approximately 5.2 miles west, 6.3 miles north-northeast, 7.9 miles northeast, and 8.8 miles northwest of the Project Site, respectively. The active San Andreas Fault Zone is located approximately 36 miles northeast of the Project Site.

In addition, the 2011 City of Los Angeles Building Code, updated since the 1994 Northridge Earthquake and with which the Project would be required to comply, contains construction requirements to ensure habitable structures are built to a level such that they can withstand acceptable seismic risk.

Based on the information contained in the Geotechnical Investigation, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and there are no

known faults (active, potentially active, or inactive) that pass directly beneath the surface of the Project Site, which are known to result in ground ruptures. Thus, the possibility of damage due to ground rupture is considered low since active faults are not known to cross the Project Site. **Therefore, impacts related to ground rupture from known earthquake faults would be less than significant.**

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily upon the earthquake magnitude, the distance from the source, and the site response characteristics. As discussed previously, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act. The primary seismic hazard for this Project is the potential for strong ground motion from future earthquakes within the Los Angeles Basin. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region which may affect the site include ground lurching and shallow ground rupture, soil liquefaction, dynamic settlement, seiches and tsunamis. These secondary effects of seismic shaking are a possibility throughout the Southern Californian region and are dependent on the distance between the site and causative fault and the on-site geology. The major active nearby (within about 15 km) faults that could produce these secondary effects include the Elysian Park, Puente Hills, Hollywood, Santa Monica, Newport-Inglewood, and Verdugo Faults. However, the potential for strong ground motion at this site is not unusual for Southern California. With regard to the potential occurrence of potentially catastrophic geotechnical hazards such as fault rupture, earthquake-induced landslides, liquefaction, etc. the geotechnical recommendations listed in the Geotechnical Report should provide adequate protection for the proposed development to the extent required to reduce seismic risk to an “acceptable level.” Site parameters for seismic design are presented in Section 6.3 of the Geotechnical Report (Appendix B of this SCEA).

Several buried thrust faults, which differ from surface faults, commonly referred to as blind thrusts, underlie the Los Angeles Basin at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987 Mw 5.9 Whittier Narrows earthquake and the January 17, 1994, Mw 6.7 Northridge earthquake were a result of movement on the Puente Hills Blind Thrust and the Northridge Thrust, respectively. The Puente Hills Blind Thrust, a buried thrust fault, underlies the site at depth greater than 3.0 kilometers. This thrust fault and others in the Los Angeles area are not exposed at the surface and do not present a potential surface fault rupture hazard at the Project Site; however, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the Project Site. The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern

California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

Accordingly, the design and construction of the Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, as well as the applicable recommendations of the Geotechnical Investigation which would ensure impacts associated with seismic hazards would remain less than significant. **Therefore, construction and operation of the Project would not exacerbate current environmental conditions that would create a significant hazard with respect to ground shaking, and impacts would be less than significant.**

iii) Seismic-related ground failure, including liquefaction?

No Impact. A project would have a significant impact related to geology and soils if it exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The current standard of practice requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure.[74] Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

According to the County of Los Angeles Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, based on the Geotechnical Investigation, the Seismic Hazards Maps for the State of California does not classify the Project Site as part of the potentially liquefiable area. This determination is based on groundwater depth record, soil type and distance to a fault capable of producing a substantial earthquake. The historically highest groundwater level for the Project Site is reported to be at a depth of approximately 85 feet below grade. Based on the density of the soils underlying the Project Site, and the mapped depth to the historically highest groundwater level, the soils underlying the Project Site are not considered capable of liquefaction during the ground motion expected during the design-based earthquake. Therefore, the potential for liquefaction occurring at the Project Site is considered to be very low. The Project shall also comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project,

[74] *Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California and Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California.*

and as it may be subsequently amended or modified. **Therefore, no impacts associated with the seismic related hazards including liquefaction would occur.**

iv) Landslides?

No Impact. The Project would have a significant impact related to geology and soils if the Project exposes people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The topography at the Project Site is relatively level and the topography in the immediate site vicinity slopes gently to the southwest. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[75] The County of Los Angeles Safety Element indicates the Project Site is not within a hillside area or an area identified as having a potential for slope instability. Additionally, the Project Site is not within an area identified as having a potential for seismic slope instability.[76] There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the Project is considered low. **Therefore, the Project would not exacerbate current environmental conditions that would create a significant hazard with respect to landslides, and no impact would occur.**

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Although development of the Project has the potential to result in the erosion of soils during site preparation, grading/excavation, and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. The Applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. Minor amounts of erosion and siltation could occur during grading. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. The application of

[75] *City of Los Angeles, NavigateLA, https://navigatela.lacity.org/navigatela/.*

[76] *California Department of Conservation, Landslide Inventory Map of the Hollywood Quadrangle, Los Angeles County, California, 2013. https://www.dropbox.com/s/ggmfubpu5dciz0f/lsim_hollywood.pdf?dl=0.*

Best Management Practices (BMPs) includes but is not limited to the following regulatory compliance measures: (1) Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity; and (2) Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

Additionally, prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Compliance with regulatory measures would ensure a less-than-significant impact would occur with respect to erosion or loss of topsoil during construction.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The majority of the Project Site would be covered by the proposed residential, commercial, and hotel structures that so little soil would be exposed. Thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, the impacts of soil erosion during Project operation would be less than significant. **As such, with compliance with regulatory compliance measures, construction and operation of the Project would not exacerbate current environmental conditions that would create a significant hazard with respect to the loss soil erosion or loss of topsoil, therefore resulting in a less than significant impact.**

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

Less Than Significant Impact. The Project would have a significant impact related to geology and soils if it is located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse caused in whole or in part by the Project's exacerbation of existing environmental conditions.

As noted above, the Project Site is not within a liquefaction zone and is not located in an area susceptible to liquefaction or collapse. Additionally, the Project Site is relatively level, with no pronounced highs or lows. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity, and there is little or no potential for subsidence. The Geotechnical Investigation concluded that geotechnical conditions

are favorable for the Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Project to the satisfaction of the Department of Building and Safety. Accordingly, the design and construction of the Project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with unstable geologic unit or soils remain less than significant. As such, construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, lateral spreading, subsidence, liquefaction or collapse. **With the implementation of Building Code requirements and regulatory compliance measures, above, the potential for landslide, lateral spreading, subsidence, liquefaction, or collapse, or the exacerbation of such, would be reduced to a less-than-significant level.**

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

No Impact. A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

Based on the results of the Geotechnical Investigation, the proposed structures would not be prone to the effects of expansive soils. Although not anticipated for the Project, all imported fill shall be observed, tested, and approved by Geocon West prior to bringing soil to the Project Site. Rocks larger than 6 inches in diameter shall not be used in the fill. If necessary, import soils used as structural fill should have an expansion index less than 20 and corrosivity properties that are equally or less detrimental to that of the existing onsite soils. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required. Additionally, the LADBS has reviewed the Geotechnical Investigation and provided a Soils Report Approval Letter (see Appendix B of this SCEA). **Therefore, no impact would occur with respect to expansive soils.**

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

No Impact. This question would apply to the Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. **Therefore, no impacts related to alternative wastewater disposal systems would occur.**

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with a Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in the Central City North Community Plan Area of the City of Los Angeles, and as described above, the Project Site has been graded and is currently improved with four office/retail buildings. The Project Site does not contain any known vertebrate paleontological resources.[77] This is further supported by correspondence received from the Natural History Museum of Los Angeles County dated June 14, 2018 (contained in Appendix I.3), which states that no vertebrate fossil localities lie directly within the Project Site boundaries. The Project Site area contains surface composites of younger Quaternary Alluvium. Although these deposits usually do not contain significant fossil vertebrates in the upper layers, the Natural History Museum has concluded that varying depths of excavation may well contain significant vertebrate fossils. The Project proposes one subterranean level, and would require the excavation and export of approximately 28,000 cubic yards of soil. Shallow excavations in the younger Quaternary Alluvium exposed throughout the Project Site are unlikely to uncover significant fossil vertebrate remains. As such, it is unlikely that older Quaternary deposits would be uncovered, since shallow excavations have already been exposed on the Project Site, and the Project would include only one level of subterranean. Therefore, although no paleontological resources are known to exist on-site, there is a potential for unanticipated discovery of paleontological resources to exist at sub-surface levels on the Project Site, which may be uncovered during grading activities for construction of the Project's building foundations. Under California Public Resources Code Sections 5097.5 and 30244, if any paleontological materials are encountered during the course of project development, all further development activities shall halt and the City of Los Angeles Department of Building and Safety shall be notified if paleontological resources are discovered during excavation, grading, or construction, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines. **With adherence to the standard paleontological compliance measure identified above, impacts to paleontological resources would be less than significant.**

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and the related projects. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of

[77] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

the mitigation measures above, potential impacts would be less than significant. **Therefore, cumulative geology and soil 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?	☐	☐	☒	☐

Regulatory Environment

INTRODUCTION

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, SCAG and the City to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. Details of the GHG analysis are provided in the *CalEEMod worksheets*, which are attached as Appendix A of this SCEA, and are incorporated by reference.

ENVIRONMENTAL SETTING

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents

radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, as GHG from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the world - in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.[78]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[79]

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the United States Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2019 report, published in December 2019, atmospheric carbon dioxide (CO_2) concentrations in 2018 were found to be 47 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[80] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHGs, these have also increased significantly since 1990.[81] In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[82]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects

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78 *USEPA, Climate Change Indicators: Greenhouse Gases, https://www.epa.gov/climate-indicators/greenhouse-gases, accessed September 1, 2021.*

79 *Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.*

80 *P. Friedlingstein et al.: Global Carbon Budget 2019, 2019.*

81 *USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data, Accessed December 2021.*

82 *USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.*

in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[83]

In December 2015, the US entered into the Paris Agreement which has a goal of keeping a global temperature rise this century below 2 degrees Celsius above pre-industrial levels and limit the temperature increase further to 1.5 degrees Celsius. This agreement requires that all parties report regularly on emissions and implementation efforts to achieve these goals.

Regarding the adverse effects of global warming, as reported by SCAG:

> *Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem.*[84]

GHG FUNDAMENTALS

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[85] More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in Table 4.7 below.[86,87]

Not all GHGs possess the same ability to induce climate change. Carbon dioxide is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global

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83 *United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.*

84 *SCAG, The State of the Region—Measuring Regional Progress, December 2006, p. 121.*

85 *As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.*

86 *Intergovernmental Panel on Climate Change, Second Assessment Report, Working Group I: The Science of Climate Change, 1995.*

87 *Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.*

Table 4.7
Description of Identified GHGs[a]

GREENHOUSE GAS	GENERAL DESCRIPTION
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

[a] *GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.*
Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

warming potential (GWP) than CO_2. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of carbon dioxide (CO_2e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO_2.

The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that time.[88] These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values in its Fourth Assessment Report (AR4). The GWPs in the IPCC AR4 are used by CARB for reporting Statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has revised down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software CalEEMod is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in Table 4.8, below.

Projected Impacts of Global Warming in California

In 2009, California adopted a statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The California Natural Resources Agency will be updating the CAS and is responsible for preparing reports to the Governor on the status of the CAS. The Natural Resources Agency has produced climate change assessments which detail impacts of global warming in California.[89] These include:

[88] *GWPs and associated CO2e values were developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.*

[89] *State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact, accessed December 2021.*

Table 4.8
Atmospheric Lifetimes and Global Warming Potentials

GAS	ATMOSPHERIC LIFETIME (YEARS)	GLOBAL WARMING POTENTIAL (100-YEAR TIME HORIZON) (AR4 ASSESSMENT)	GLOBAL WARMING POTENTIAL (100-YEAR TIME HORIZON) (AR5 ASSESSMENT)
Carbon Dioxide (CO_2)	50-200	1	1
Methane (CH_4)	12 (+/-3)	25	28
Nitrous Oxide (N_2O)	114	298	265
HFC-23: Fluoroform (CHF_3)	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124	138
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200	11,100
Sulfur Hexafluoride (SF_6)	3,200	22,800	23,500
Nitrogen Trifluoride (NF_3)	740	17,200	16,100

Source: IPCC, *Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials*.

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.
- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures and saltwater contamination resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO_2; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.[90]

REGULATORY FRAMEWORK

There are a number of plans, regulations, programs, and agencies that provide policies, requirements, and guidelines regarding GHG emissions at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Federal Clean Air Act
- Corporate Average Fuel Economy (CAFE) Standards
- Energy Independence and Security Act
- California Air Resources Board
- California Greenhouse Gas Reduction Targets
- California Global Warming Solutions Act (AB 32)
- Climate Change Scoping Plan
- Cap-and-Trade Program
- Emission Performance Standards
- Renewables Portfolio Standard Program
- Clean Energy and Pollution Reduction Act
- Pavley Standards
- California Low Carbon Fuel Standard
- Advanced Clean Cars Regulations
- Sustainable Communities and Climate Protection Act (SB 375)
- Senate Bill 743
- Executive Order N-79-20
- California Appliance Efficiency Regulations
- Title 24, Building Standards Code and CALGreen Code
- CEQA Guidelines
- South Coast Air Quality Management District
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- Green New Deal
- City of Los Angeles Green Building Code
- City of Los Angeles Solid Waste Programs and Ordinances

[90] *Paul R. Epstein, et al., Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.*

- City of Los Angeles General Plan
- Traffic Study Policies and Procedures

Federal

Federal Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHGs are pollutants under the federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, methane and other non-CO_2 gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011 and later for model years 2012-2016, and 2017-2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.[91] These standards set a combined fleet wide average of 36.9 to 37 for the model years affected. [92]

[91] *United States Environmental Protection Agency, Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.*

[92] *National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy standards.*

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the EPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons.[93]

Energy Independence and Security Act

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

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

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[94]

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93 *U.S. EPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.*

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

State

California Air Resources Board

The CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the Federal Government and the local air districts. The SIP is required for the State to take over implementation of the Federal Clean Air Act. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

California Greenhouse Gas Reduction Targets

Executive Order S-3-05

Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:

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

In accordance with Executive Order S-3-05, the Secretary of CalEPA is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. The CAT provides periodic reports to the Governor and Legislature on the State of GHG reductions in the State as well as strategies for mitigating and adapting to climate change.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. 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.

California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code (HSC), Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines regulated GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions.

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 consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.[95]

[95] *CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are: (1) a low-carbon fuel standard, which reduces carbon intensity in fuels statewide; (2) reduction of refrigerant*

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of state climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill linked to SB 32 and signed on September 8, 2016, prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

Climate Change Scoping Plan

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (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 initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities. 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 (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan Update shifted focus to the newer Senate Bill (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 towards achieving the AB 32 goal of returning to 1990 GHG 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

losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.

to achieve new targets for 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. 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 lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires. The estimated Statewide GHG emissions reductions in the 2022 Scoping Plan are summarized in Table 4.9, below.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State 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.

Table 4.9
Estimated Statewide Greenhouse Gas Emissions Reductions in the 2022 Scoping Plan

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[a] *312 – 260 = 52. 52 / 312 = 16.7%*

CARB, Final 2022 Climate Change Scoping Plan, November 2022.

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 Green New Deal and Green Building Code. Each of these is discussed further below.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program[96] pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The Statewide cap for GHG emissions from the capped sectors[97] (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program.[98] Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured

[96] *California Code of Regulations 17, Section 95800 to 96023.*
[97] *California Code of Regulations 17, Section 95811, 95812.*
[98] *California Code of Regulations 17, Section 95812.*

against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR").[99]

Each covered entity with a compliance obligation is required to surrender "compliance instruments"[100] for each $MTCO_2e$ of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the Statewide emission limits will not be exceeded. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.[101] Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[102]

The Program applies to emissions that cover approximately 80 percent of the State's GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

Energy-Related (Stationary) Sources

Emission Performance Standards

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity.

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[99] *California Code of Regulations 17, Section 95100-95158.*

[100] *Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.*

[101] *California Code of Regulations 17, Section 95811(b).*

[102] *California Code of Regulations 17, Section 95811, 95812(d).*

These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewables Portfolio Standard

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as a Renewables Portfolio Standard (RPS). Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statues of 2015), also known as the Clean Energy and Pollution Reduction Act, further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 also requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. The 2017 Climate Change Scoping Plan incorporated the SB 350 standards and estimated the GHG reductions would account for approximately 21 percent of the Scoping Plan reductions.[103] On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.[104]

Mobile Sources

Pavley Standards

AB 1493 (Chapter 200, Statutes of 2002), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In 2004, CARB approved the Pavley regulation to require automakers to control greenhouse gas emissions from new passenger vehicles for the 2009 through 2016 model years. Upon adoption of subsequent federal greenhouse gas standards by the United States Environmental Protection Agency (U.S. EPA) that preserved the benefits of the Pavley regulations, the Pavley regulations were revised to accept compliance with the federal standards as compliance with California's standards in the 2012 through 2016 model years. This is referred to as the "deemed to comply" option.

In January 2012, CARB approved greenhouse gas emission regulations which require further reductions in passenger greenhouse gas emissions for 2017 and subsequent vehicle model years. As noted above, in August 2012, the USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles.[105] On November 15, 2012, CARB approved

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[103] *CARB, California's 2017 Climate Change Scoping Plan, Table 3, p. 31, November 2017. Calculated as: (108 – 53) / 260 = 21 percent.*

[104] *California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.*

[105] *United States Environmental Protection Agency, 2012.*

an amendment that allows manufacturers to comply with the 2017-2025 national standards to meet State law. Automobile manufacturers generally comply with these standards through a combination of improved energy efficiency in vehicle equipment (e.g., air conditioning systems) and engines as well as sleeker aerodynamics, use of strong but lightweight materials, and lower-rolling resistance tires.[106]

In 2018, the USEPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE) which would roll back fuel economy standards and revoke California's waiver. The rule amended certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. On March 30, 2020, the SAFE Rule was finalized and published in the Federal Register, commencing a review period. Subsequent legal challenges from a coalition of states, including California, and private industry groups were issued. In August 2021, USEPA proposed to revise and strengthen the emissions standards for passenger cars and light trucks for model years 2023-2026.

On September 27, 2019, the USEPA withdrew the waiver it had previously provided to California for the State's GHG and ZEV programs under Section 209 of the Clean Air Act.[107] The withdrawal of the waiver was effective November 26, 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[108] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs.[109]

California Low Carbon Fuel Standard

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a LCFS for transportation fuels be established in California. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted.[110]

The development of the 2017 Scoping Plan Update has identified LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards

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106 *CARB,* California's Advanced Clean Cars Midterm Review*, pp. ES-17, C-9.*

107 *84 FR 51310.*

108 *United States District Court for the District Court of Columbia,* State of California vs. Chao*, Case 1:19-cv-02826, 2019.*

109 *United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.*

110 *CARB, Low Carbon Fuel Standard - About, https://www.arb.ca.gov/fuels/lcfs/lcfs.htm. accessed December 2021.*

were amended by CARB to require a 20 percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.[111]

Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars program, an emissions-control program for model years 2015–2025.[112] The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[113] During the March 2017 Midterm Review, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.[114] Effective November 26, 2019, the federal SAFE Vehicles Rule Part One: One National Program withdrew the California waiver for the GHG and ZEV programs under section 209 of the Clean Air Act, which revokes California's authority to implement the Advanced Clean Cars and ZEV mandates. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver.[115] In April 2021, the USEPA announced it will move to reconsider its previous withdrawal of the waiver.[116]

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The state would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

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[111] *CARB, CARB amends Low Carbon Fuel Standard for wider impact, 2018, https://ww2.arb.ca.gov/index.php/news/carb-amends-low-carbon-fuel-standard-wider-impact. accessed December 2021.*

[112] *CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed December 2021.*

[113] *CARB, Advanced Clean Cars Program - About, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed December 2021.*

[114] *CARB, News Release: CARB finds vehicle standards are achievable and cost-effective, https://ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective, accessed December 2021.*

[115] *United States District Court for the District Court of Columbia, State of California vs. Chao, Case 1:19-cv-02826, 2019.*

[116] *United States Federal Register, California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment (Document Number: 2021-08826), April 28, 2021.*

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package is anticipated to be presented to the Board in June 2022.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. SB 375 finds that the "transportation sector is the single largest contributor of greenhouse gases of any sector."[117] Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the Metropolitan Planning Organization in which the City of Los Angeles is located in. CARB set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010, and updated them in 2018.[118] In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.[119] As discussed further below, SCAG has adopted an updated Regional Transportation Plan / Sustainable Community Strategies (RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 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.[120]

Under SB 375, the target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS.

Senate Bill 743

Governor Brown signed Senate Bill (SB) 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas

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[117] *State of California, Senate Bill No. 375, September 30, 2008.*

[118] *CARB, Sustainable Communities & Climate Protection Program – About. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about.accessed December 2021.*

[119] *CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, 2018.*

[120] *SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, 2020.*

served by transit, the required alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

Building Standards and Other Regulations

California Appliance Efficiency Regulations

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24, Building Standards Code and CALGreen Code

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality."[121] The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.[122]

[121] *California Building Standards Commission, 2010 California Green Building Standards Code, (2010).*
[122] *California Building Standards Commission, 2010 California Green Building Standards Code, (2010).*

On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which went into effect on January 1, 2020. The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.[123] The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Single-family homes built with the 2019 Title 24 Standards are projected to use approximately seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy due mainly to lighting upgrades.[124] Compliance with Title 24 is enforced through the building permit process.

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.[125]

CEQA Guidelines

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97) (Chapter 185, Statutes of 2007), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.[126] The CEQA Guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or

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123 *CEC, 2019 Building Energy Efficiency Standards.*

124 *CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.*

125 *California Energy Commission, 2022 Building Energy Efficiency Standards.*

126 *See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).*

performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[127]

The administrative record for the amendments to the CEQA Guidelines also clarifies "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[128]

Regional

South Coast Air Quality Management District CEQA Guidance

The City of Los Angeles is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.[129] A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.[130] The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 $MTCO_2e$ per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 $MTCO_2e$ per year would be assumed to have a less than significant impact on climate

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[127] *14 Cal. Code Regs. § 15064.4(b).*

[128] *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.*

[129] *SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, http://www3.aqmd.gov/hb/2008/December/081231a.htm. accessed December 2021.*

[130] *SCAQMD, Greenhouse Gases CEQA Significance Thresholds, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds. accessed December 2021.*

change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2046 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) in October 2020. 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 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.[131] 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. Transit Priority Areas[132] (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice 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.

[131] *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

[132] *Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours*

The 2020–2045 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.[133] 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, 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. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential) or per employee (office) 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). The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double counted in the SB 375 target calculation.

Local

Green New Deal

The City of Los Angeles addressed the issue of global climate change in *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan/ClimateLA") in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities.

In April 2019, the *Green New Deal (Sustainable City Plan 2019)*, was released, consisting of a program of actions designed to create sustainability-based performance targets through 2050 designed to advance economic, environmental, and equity objectives.[134] L.A.'s Green New Deal is the first four-year update to the City's first Sustainable City pLAn that was released in 2015.[135] It augments, expands, and elaborates L.A.'s vision for a sustainable future and tackles the climate emergency with accelerated targets and new aggressive goals.

While not a plan adopted solely to reduce GHG emissions, within the Green New Deal, "Climate Mitigation," or reduction of GHG is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sq. ft. in 2015).

[133] *SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, 2020.*
[134] *City of Los Angeles. LA's Green New Deal, 2019.*
[135] *City of Los Angeles, Sustainable City pLAn, April 2015.*

- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

City of Los Angeles Green Building Code

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, whose goal is to lead the City towards being a "zero waste" City by 2030. These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion for the City to 76 percent as of 2013.[136] The RENEW LA Plan, aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.[137] The City has also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City's Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City's zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC also requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions—more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

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[136] *City of Los Angeles, Department of Public Works, LA Sanitation, Recycling. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188. accessed December 2021.*

[137] *City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.*

City of Los Angeles General Plan

The City does not have a General Plan Element specific to climate change and GHG emissions, but several goals, objectives, or policies in the Air Quality Element, Housing Element, Plan for Healthy LA, and Mobility Plan 2035 encourage the reduction of emissions. However, the following five goals from the City's General Plan Air Quality Element would also lead to GHG emission reductions:[138]

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

Housing Element (Housing Needs Assessment)

The Housing Element of the General Plan is prepared pursuant to state law and provides planning guidance in meeting housing needs identified in the SCAG Regional Housing Needs Assessment (RHNA). The Housing Element 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 and preserve sustainable, mixed-income neighborhoods across the City.

The Housing Needs Assessment chapter of the Housing Element discusses the City's population and housing stock to identify housing needs for a variety of household types across the City. 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 in affordable housing, the Housing Element provides measures to streamline and incentivize development of affordable housing. Such measures include revising density bonuses for affordable housing; identifying locations which are ideal for funding programs to meet low-income housing goals; and rezoning areas to encourage low-income housing. With implementation of such measures to increase affordable housing, the Housing Element predicts a significant increase in housing production at all income ranges compared to previous cycles.

The Housing Element also promotes sustainability and resilience, and environmental justice through housing, as well as the need to reduce displacement. It encourages the utilization of alternatives to current parking standards that lower the cost of housing, support GHG and VMT

[138] *City of Los Angeles, Air Quality Element, June 1991, pages IV-1 to IV-4.*

goals and recognize the emergence of shared and alternative mobility. The Element also identifies housing strategies for energy conservation, water conservation, alternative energy sources and sustainable development which support conservation and reduce demand.

Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32 and the region's Sustainable Community Strategy.

Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the City Transportation Assessment Guidelines (TAG) (July 2019, updated July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation assessment. The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts and thus is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with AB 32, SB 32, and SB 375.

2022 Scoping Plan Update, Local Actions

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, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. 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 are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). "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[139] 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.

GHG Significance Threshold

Section 15064.4 of the CEQA Guidelines provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify greenhouse gas emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance based standards. Lead agencies should consider several factors when determining of significance of GHG emissions from a project: (a) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (b) whether a project exceeds a significance threshold that the lead agency determines applies to the project; and (c) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for the reduction or mitigation of greenhouse gas emissions.

Section 15064.4 does not establish any threshold of significance with regard to GHG impacts. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)). As a note, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans

[139] *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.*

or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions." Therefore, Section 15064(h)(3) allows a lead agency to make a finding of a less than significant impact for cumulative GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

The City has not adopted a numeric significance threshold for the analysis of GHG impacts. In the absence of any applicable 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 GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020-2045 RTP/SCS (Connect SoCal Plan), which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the 2022 *Scoping Plan*, and the City of Los Angeles' Green New Deal.

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.

Construction

Construction activity impacts are relatively short in duration, and they contribute a relatively small portion of the total lifetime GHG emissions of a project. In addition, GHG emissions-reduction measures for construction equipment are relatively limited.[140] Therefore, in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*,[141] the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. Emissions of GHGs were calculated using CalEEMod (*Version 2022.1*) for each year of construction of the Project and the results of this analysis are presented in Table 4.10, Project Construction-Related Greenhouse Gas Emissions.

[140] *SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, accessed November 2021.*

[141] *SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, accessed November 2021.*

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 38-month duration of construction activities. As shown in Table 4.10, the total GHG emissions from Project construction activities would be 2,488 metric tons with the greatest annual emissions occurring in 2023.

Table 4.10
Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2023	1,152
2024	983
2025	353
Total Construction GHG Emissions	**2,488**
30-Year Amortized Annual Emissions [b]	***82.93***

[a] *Construction CO_2 values were derived using CalEEMod Version 2022.1 Calculation data and results are provided in Appendix A, Air Quality Modeling and Greenhouse Gas Emissions Worksheets.*
[b] *Consistent with SCAQMD recommended methodology for addressing construction emissions, the total construction emissions were amortized over a 30 year projected lifetime.*

Operation

Baseline GHG Emissions

The Project Site is developed with four office/retail buildings that occupy the Project Site, which serves as the existing conditions baseline. The operations of the on-site office/retail uses generate GHG emissions as a result of vehicle trips (mobile sources) and building operations involving the use of electricity, natural gas, water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model recommended by the SCAQMD. Table 4.11, Existing Project Site Greenhouse Gas Emissions, presents the GHG emissions associated with operation of the existing office/retail buildings at the Project Site. As shown in Table 4.11, the existing operations on the Project Site generate approximately 1,387 CO^2e MTY.

Table 4.11
Existing Project Site Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Mobile	764
Area	1.87
Energy	540
Water	55.3
Waste	26.2
Refrigerants	0.04
Total	**1,387**

Calculation data and results provided in Air Quality Modeling and Greenhouse Gas Emissions Calculations Worksheets. (See Appendix A to this SCEA)

Project GHG Emissions

The GHG emissions resulting from operation of the Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Project's compliance with the *L.A. Green Building Code* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. The Project's emissions were calculated using CalEEMod for a base project without the energy conservation measures mandated by the Green Building Code and with GHG reduction measures for purposes of quantifying the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table 4.12, below, the net increase in GHG emissions generated by the Project under the Base Project Without GHG Reduction Measures and without the removal of Existing Use GHG emissions would be 6,069 CO_2e MTY, and the Project With GHG Reduction Measures scenario including removal of existing use GHG emissions would result in a net increase of 3,028 CO_2e MTY.

Table 4.12
Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)		
	Base Project Without GHG Reduction Features	Proposed Project	Percent Reduction [a]
Mobile	4,039	2,638	35%
Area	11.6	11.6	0%
Energy	1,653	1,521	8%
Water	67.3	53.8	20%
Waste	154	46.2	70%
Refrigerants	52.4	52.4	0%
Stationary	9.17	9.17	0%
Construction Emissions [b]	82.93	82.93	--
Project Total:	**6,069**	**4,415**	**27%**
Less Existing Project Site Uses:	*-- [c]*	*-1,387*	--
Project Net Total:	**6,069**	**3,028**	**50%**

Notes:
[a] *The Percent Reduction is not a quantitative threshold of significance, but shows the efficacy of the Project's compliance with the various regulations, plans and policies that have been adopted with the intent of reducing GHG emissions.*
[b] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Project as per SCAQMD guidance.*
[c] *The existing emissions were not deducted from the Project Without GHG Reduction Measures to demonstrate the benefit of developing on an infill lot with active commercial uses compared to a base project on vacant land.*
Calculation data and results provided in Appendix A, Air Quality Modeling and Greenhouse Gas Emissions Worksheets.

Mobile Source Emission

Mobile source emissions are based on trip rates, trip lengths, percent trip type, and on-road emission factors generated by CARB. Exhaust emissions increase or decrease depending upon land use (e.g., maximum residential ITE trip rate higher than weekday resulting in higher residential exhaust emissions).

Area Source Emissions

Area sources are non-stationary, non-mobile emission sources found in a variety of land uses such as fireplaces, consumer products, landscaping equipment, and architectural coatings. Consumer products are various solvents used in nonindustrial applications which emit ROGs during their product use. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. The Project would utilize low volatile organic compound emitting paints, sealants, fabrics, insulation, and flooring as required by CALGreen compliance and would be incorporated into the materials framework. Outdoor air monitoring equipment and MERV 13 filters would be installed on every Air Handling Unit.

Energy Source Emissions

Energy source GHG emissions are a result of activities in buildings that consume electricity, natural gas, and/or fossil fuels. In compliance with the City's Ordinance 187,714, the multi-family residences would be required to be all-electric. Combustion of any type of fossil fuel emits CO_2 and other GHGs directly into the atmosphere; when this occurs in a building, such as the use of a diesel powered emergency generator, it is a direct emission source associated with that building. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for the LADWP were selected in CalEEMod. Emissions from the combustion of natural gas and other fuels from the implementation of the Project are calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting. Furthermore, the Proposed Project would comply with the City of Los Angeles Ordinance No. 187,714 which requires all new buildings constructed within the City to be all-electric buildings, with the exception of cooking equipment contained within kitchens located in a public use area, as defined in the California Building Code Chapter 2, such as restaurants, commissaries, and cafeterias.

Water and Wastewater Emissions

The Project will result in indirect GHG emissions due to water consumption and wastewater generation. GHG emissions resulting from the Project's water consumption and wastewater

generation are calculated to account for the energy intensive processes associated with off-site potable water treatment and conveyance and wastewater treatment and conveyance systems. For purposes of this comparison, it should be noted that the Project's structural and operational features would include installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Project. When considering the fact that the Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB 375, and SCAG's Connect SoCal), the Project would realize an 85% reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use. The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Project's infill and smart growth attributes (i.e., replacement of existing uses and location of high density housing and hotel, commercial office, and neighborhood serving retail uses in a high quality transit area) and its compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Solid Waste Emissions

The Project's solid waste emissions are calculated in CalEEMod based on the type and size of the proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHGs emitted. The Project is subject to construction and demolition waste recycling of at least 65 percent, per Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen). In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

Refrigerants Emissions

Emissions related to refrigerant sources were calculated using the CalEEMod emissions inventory model, which are used in air conditioning and refrigeration equipment.

Stationary Emissions

Emissions related to stationary sources were calculated using the CalEEMod emissions inventory model. It is anticipated the Proposed Project would include an emergency generator on-site.

For purposes of this comparison, it should be noted that the Project's structural and operational features would include installing energy efficient lighting, low flow plumbing fixtures, ENERGY STAR-rated appliances, and implementing an operational recycling program during the life of the Project. When considering the fact that the Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional and local plans and policies (i.e., SB 32, SB 375, and SCAG's Connect SoCal), the Project would realize a 50%

reduction in GHG emissions as compared to a base project of the same size without replacing an existing land use. The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Project's infill and smart growth attributes (i.e., replacement of existing uses and location of high density housing and hotel, commercial office, and neighborhood serving retail uses in a high quality transit area) and its compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in fact new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels. **Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment. Therefore, a less than significant impact would occur.**

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. A significant impact would occur if the Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. The Project would comply with the City of Los Angeles' Green Building Ordinance standards that reduce emissions beyond the "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the state's codes.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the Bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Project's consistency with the SCS is provided further below.

Consistency with the 2022 Scoping Plan

As discussed above, jurisdictions that want 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 (transportation electrification, VMT reduction, and building decarbonization). 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). A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero-emission vehicles (ZEV)**

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA 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 followed 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 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. Pursuant to City's Green Building Code, a minimum of 30 percent of the total code required parking is required to be capable of supporting future EVSE. Twenty (20) percent of the required commercial parking spaces and 25 percent of the required residential parking spaces is required to be low power electric vehicle charging stations (EVCS), which can be counted towards the total number of EVSE spaces. The provision of EV infrastructure would further serve to promote the

utilization of alternative fueled vehicles thus, reducing the combustion of fossil fuels. Therefore, 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.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

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 electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. 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. The Project would support zero emission vehicles with the promotion of electric vehicle supply equipment (EVSE) on-site. Pursuant to City's Green Building Code, a minimum of 30 percent of the total code required parking is required to be capable of supporting future EVSE. Twenty (20) percent of the required commercial parking spaces and 25 percent of the required residential parking spaces is required to be low power electric vehicle charging stations (EVCS), which can be counted towards the total number of EVSE spaces. Thus, the Project would comply with the LAMC by installing EV chargers in at least 10 percent of total proposed parking spaces which would exceed the CALGreen 2022 requirement.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**

- **Implement parking pricing or transportation demand management pricing strategies**

The City of Los Angeles Mobility Plan 2035 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, the implementation of Mobility Plan Programs and AB

2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

The Project is subject to the Central City Parking District parking requirements, which is lower than the Citywide parking requirements. Therefore, the Project would provide a reduced number of parking. Therefore, the Project would be consistent and not conflict with this reduction strategy to reduce parking standards.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

The City of Los Angeles Mobility Plan 2035 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, 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 under Mitigation Measures MM-T-1 and MM-T-2 would include shared mobility and TDM promotions and marketing to encourage alternative modes of transportation. 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)**

- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

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. Please refer below for additional discussion of consistency with the 2020-2045 RTP/SCS.

On a local level, 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, continues to build out networks in the Mobility Plan 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.

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, vehicle miles traveled (VMT), and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and LADOT bus lines. The Project Site is located less than one-half mile from two Metro Stations, the Pico Station and the Grand/LATTC Station. Additionally, the Metro Expo Line railway immediately borders the Project Site to the west. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage 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. This represents more than double the housing planned for during the last eight years. 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. 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.

As discussed above, 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 20-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 Housing Division found based, on market studies and experiences of other agencies, that mandating 20-percent affordable housing on 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 would provide 250 dwelling units on a 1.73-acre site, and the Project would consist of transit-supportive densities higher than 20 dwelling units per acre. The Project would replace an existing commercial/retail and office spaces. Therefore, the Project would not result in a net loss of natural or working lands or affordable housing units. The Project would also provide unbundled parking, which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. Furthermore, as mentioned previously, the Project Site is located in a highly urbanized area in the City of Los Angeles within a HQTA and a TPA. The Project Site is located less than one-half mile from two Metro Stations, the Pico Station and the Grand/LATTC Station. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. Therefore, the location of the Project Site encourages a variety of transportation options. Thus, these Project characteristics would result in a reduction in VMT, which would overall reduce GHG emissions.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes for residential and commercial uses**

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables

Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-elective, which will reduce GHG emissions related to natural gas combustion. 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 LAMC regulations 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 that requires all new buildings to be all-electric buildings and would not include natural gas uses in residential, retail and office uses. Therefore, the Project would be consistent and not conflict with the 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 has established rebate programs to promote use of energy-efficient products and home upgrades. Under the 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 not involve retrofit of existing buildings and would be completely new construction. However, the Project would be designed with HVAC equipment to have low GHG emission rates and incorporate energy saving technologies and appliances. Therefore, the Project would be consistent and not conflict with policies to implement energy efficiency retrofits.

Consistency with Connect SoCal

The Project is consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020-2045 RTP/SCS), which are based on changing the region's land use and travel patterns:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;

- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

The Project represents an infill development within an existing urbanized area that would concentrate new hotel, residential, and commercial uses within a HQTA. The Connect SoCal plan defines a HQTA as generally walkable transit villages or corridors that are within 0.5-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020-2045 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Inclusion of mixed-use development standards that include local serving retail.

- Increased Complete Streets investments around HQTAs. Complete Streets are streets designed, funded and operated to enable safe access for roadway users of all ages and abilities, including pedestrians, bicyclists, motorists and transit riders. The Project will provide safe, clean and easy to use access points to and from the Project Site, and would provide infrastructure improvements such as reinstalling street gutters, sidewalks, and street lighting (as applicable) along Venice Street and Flower Street as required to the satisfaction of the Department of Building and Safety in the proximity of the Development Site. The Project Site has frontage along Flower Street and the Metro A Line and E Line right-of-way to the west, Venice Boulevard to the north, Hope Street to the east and the I-10 freeway and an unnamed alley to the south. The Project proposes a sidewalk with a 15-foot minimum width on the western boundary fronting the Metro E Line and A Line right-of-way (running parallel with Flower Street), that includes a 5-foot dedication and a 3-foot easement. The Project also includes a 24 ½-foot sidewalk fronting Venice Boulevard along the northern property line. Along the northerly frontage along Venice Boulevard, the Project would provide an average 24-foot, 6-inch sidewalk fronting the hotel tower on the west side of the site and a minimum 12 foot sidewalk on the east portion of the Project Site, that includes a 3 foot easement and 15 foot dedication. Such improvements would facilitate active transportation options and improve transit access to residents and visitors of the Project.

- Compact growth that includes jobs and housing in areas accessible to transit and opportunities for walking and biking. The Project Site's location to other services and employment opportunities would reduce vehicle trips and overall VMT. The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. The Project represents an infill development within an

existing urbanized area that would introduce a new residential use on the Project Site, within an HQTA. The Project Site is transit accessible and is close to many bus transit lines, rail lines, and local shuttle service. Specifically, the Project Site is located within a half-mile of two nearby Metro Stations: the Pico Station which serves the Metro A Line and Metro E Line, located approximately 0.3 mile north of the Project Site; and the Grand/LATTC Station which serves the Metro A Line and is located approximately 0.3 mile southeast of the Project Site. The Project Site is currently served by a total of eight local and inner-city transit operators within approximately one-quarter mile of the Project Site, which include Metro, LADOT Downtown Area Shuttle operators, including Metro, LADOT Downtown Area Shuttle (DASH), Commuter Express (CE), Foothill Transit, Orange County Transportation Authority (OCTA), Santa Monica Big Blue Bus, Gardena Municipal Bus Lines, and Montebello Bus Lines. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project would also provide required short- and long-term bicycle parking spaces which would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. Furthermore, the Project Site is also situated within easy walking distance to retail, restaurants, entertainment, and other commercial businesses located in the Downtown area and in particular along Flower Street and Grand Avenue, which would also reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation;

- New multi-family housing in an infill location together with neighborhood-serving retail, and restaurant uses.

- New housing and job growth focused in HQTAs (defined by the 2020-2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours).

As discussed in further detail in Table 1 of Appendix P, Land Use Consistency Tables, the Project would not conflict with the goals and policies of the 2020-2045 RTP/SCS relative to transportation, land use, and housing strategies.

Consistency with L.A. Green Building Code

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the Project shall comply with all applicable mandatory provisions of the Los Angeles Green Code and as it may be subsequently amended or modified, including:

- The Project must meet Title 24 2022 standards and include ENERGY-STAR appliances. ENERGY STAR-rated appliances would reduce the Project's energy demand during the operational life of the 250 dwelling units and 300 hotel rooms.

- Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from the LA Sanitation.

- The Project shall provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. An approximate 20% reduction in water demand and associated GHG emissions is attributable to compliance with this feature. Additionally, in new residential construction or building addition or alteration over 500 square feet of cumulative landscaped area, install irrigation controllers and sensors which include the criteria specified in Section 99.04.304.2 and meet manufacturer's recommendations. Furthermore, outdoor water metering, swimming pool covers, and exterior faucets are regulated under the LAMC Section 99.04.304 for outdoor water usage.

- The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.

- Pursuant to Section 99.04.106.4.4 of the LAMC The Project would include a minimum of 10 percent of the total number of parking spaces to include Electric Vehicle (EV) Charging Stations. In addition, pursuant to LAMC Section 99.04.106.4.2, 30% of the total number of parking spaces provided shall be electric vehicle charging spaces (EVCS) capable of supporting future electric vehicle supply equipment (EVSE).

Consistency with the Sustainable City pLAn and the L.A. New Green Deal

The 2019 L.A. New Green Deal is the first four-year update to the Sustainable City pLAn. It augments, expands, and elaborates in more detail the City's vision for a sustainable future and it addresses the climate emergency with accelerated targets and new aggressive goals. The Project will contribute towards the attainment of the aspirations and goals previously identified in the Regulatory Framework discussion above by:

- Obtaining power from a utility provider that supplies 55% renewable energy by 2025.

- Including components that will reduce building energy use per square foot 22% by 2025.

- Reducing Vehicle Miles Traveled per capita by at least 13% by 2025.

- Ensuring 57% of new housing units are built within 1,500 feet of transit.

The Project would use energy from the LADWP, which currently provides 32 percent of electricity via renewable sources but has committed to providing an increasing percentage from renewable

sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The Project would be designed and constructed to meet LA Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The Project includes ENERGY STAR-rated appliances within the dwelling units and would be a modern development with energy efficient boilers, heaters and air conditioning systems. Additionally, as discussed in Checklist Question XVII(b), Transportation, the Project is expected to have a less-than-significant VMT impact with the implementation of the TDM Strategies noted under Mitigation Measure MM-T-1. The State of California Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15% or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA. Therefore, the Project's household and employee VMT per capita would fall below 15% of existing development. Further, the Project Site is located within ½ mile of two Metro stations and immediately adjacent to two major transit stops with peak commute service intervals of 15 minutes or less. As such, the Project would be consistent with the goals and initiatives in the L.A. Green New Deal.

Conclusion

As demonstrated above, the Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, Los Angeles' Sustainable City pLAn and the L.A. New Green Deal, and CARB's 2022 Scoping Plan. **Therefore, the Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Project's impact would be less than significant.**

Cumulative Impacts

Less Than Significant Impact. An individual project's GHG emissions is typically relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Project would be cumulatively considerable using a plan-based approach (supported by quantitative and qualitative analysis) to determine the project's contributing effect on climate change.

Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in GHG emissions. The Project's GHG and the resulting level of

significance is appropriately assessed in terms of the cumulative impact on global GHG emissions on climate change. Accordingly, a quantified analysis of the GHG emissions anticipated to result from construction and operational activities was calculated as part of the cumulative impact analysis. As part of that analysis, the Project's GHG emissions were analyzed on a project-specific basis with respect to its impacts on global climate change.

As shown in the analysis above, the Project would be consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32, SB 375, Connect SoCal, and the LA Green Building Code that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. By redeveloping an underutilized site and developing a mixed-use project with residential, hotel, office, and community serving retail land uses in a high-quality transit area, the Project would reduce VMTs. **Thus, the Project would not make a cumulatively considerable contribution to GHG emissions, and impacts would be less than significant.**

IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

IMPACT ANALYSIS

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project includes the construction of two high-rise buildings with up to 250 residential dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground-floor commercial/retail uses. During the operation of the Project, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The use of these substances would comply with State Health Codes and Regulations. Therefore, 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 a less than significant impact would occur.

Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. **Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.**

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

Preliminary Subsurface Methane Gas Investigation (Methane Report)

The Project Site is located within a City of Los Angeles Methane Zone. Although the Project Site is located in a City-designated Methane Zone, oil and gas wells or pipelines were not identified on the Project Site, based on information provided in the Methane Report, prepared by GeoKinetics, Inc., dated March 9, 2018 (see Appendix C of this SCEA). Additionally, the Phase I ESA identified no oil wells within 500 feet of the Project Site. Four (4) multi-stage subsurface gas probes were installed on the Project Site as part of the methane gas investigation. All four probes were installed in conjunction with an on-site geotechnical investigation using 8-inch hollow stem auger drilling equipment. The pressures and concentrations measured in each of the subsurface gas probes during the monitoring events were recorded. As a result, methane gas was not detected in any of the gas probe installations. The soil gas pressures measures in the gas probes range from -0.35 to 0.05 inches of water. This pressure range is normal and consistent with normal barometric variations. There was no indication of elevated soil gas pressures associated with methane generation or migration.

Based upon the measured methane levels and the corresponding soil gas pressures, the Methane Report concluded that the Project Site should be classified as a Level I site with a Design Methane Pressure of two inches of water in accordance with LADBS guidelines. The Methane Report provides the primary design measures applicable to the Project that are typically required by LADBS for new Level I slab-on-grade structures within a methane zone. The Project would be required to implement design features and measures required by the Department of Building and Safety for a Level I site to ensure that impacts related to methane would be less than significant.

Phase I Environmental Site Assessment

Site Reconnaissance

As discussed in the Phase I Environmental Site Assessment Report, prepared by EFI Global, Inc. ("EFI Global"), dated September 22, 2017 (See Appendix D.1 to this SCEA), on September 12,

2017, EFI Global staff conducted a site reconnaissance of the Project Site. The Project Site inspection was conducted to attempt to identify current site use(s), current hazardous materials storage, and evidence of past site uses and hazardous material storage and to identify evidence of other recognized environmental conditions. EFI Global identified the following observations/features on the Project Site: 1) hazardous substances and petroleum products containers; 2) drains, sumps, clarifiers, sewer interceptors, septic systems; and 3) electric equipment with the potential to contain fluids. Based on exterior observations, no recognized environmental conditions were observed on the Project Site. Additionally, no significant hazardous material storage or recognized environmental conditions were observed in the interior portions of the Project Site.

Records Review

A radial database search was conducted in accordance with the specifications defined in ASTM E 1527-13, which sets the radial search distances for each regulatory database. The radial database search was conducted by EDR on September 1, 2017. As concluded in the Phase I ESA, three properties were identified within regulatory databases for storing, handling or disposing of hazardous waste materials; the Bullock Boring Service property at 1606 South Flower Street, the Grover HD property located at 1616 South Flower Street, and the California Sample Service, Inc., property located at 1611 South Hope Street. The following provides the summaries of the information found in the relevant database listings and discussions regarding the potential for the Project Site to be impacted.

- Bullock Boring Service (1606 South Flower Street) - The subject property is listed on EDR US Historical Auto Station (EDR Hist Auto) database. According to the information provided the automobile repair operation, Bullock Boring Service, occupied the Project Site in at least 1933. Historical resources reviewed for the purpose of the Phase I ESA indicate 1606 South Flower Street was occupied by an auto accessories store in at least 1930 and Liquor Rectifiers by at least 1950 and therefore, the maximum potential duration of the automobile repair could have been 18 years. Automotive repair operations represent an environmental concern due to the typical use of solvents and oils. These hazardous materials, if improperly handled or disposed, have the potential to negatively impact the property subsurface. The former use of the Project Site for automotive repair operations for 18 years represents a REC for the Project Site.
- Grover HD (1616 South Flowers Street) - The subject property is listed on EDR Hist Auto database. According to the information provided and historical research, the automobile repair operations Grover HD (1933) and Miller PF (1942) historical occupied the subject property, as well as an automobile repairing and painting shop. Historical resources reviewed for the Phase I ESA reveal the auto repairing operations could have been performed on-site from at least 1928 when the subject building was first developed until at least 1950 (next known occupant, Inter State Automotive Products occupied the subject property in 1951). Based on the long-term use of subject property for automobile repair

and auto body services for a maximum of 23 years, the former auto repair and auto body operations at 1616 South Flower Street are considered a REC for the Project Site.

- California Sample Service, Inc. (1611 South Hope Street) - The subject property is listed on Resource Conservation and Recovery Act - Non Generator (RCRA NonGen / NLR), Facility Index System/Facility Registry System (FINDS), Enforcement Compliance & History Information (ECHO) and Facility and Manifest Data (HAZNET) databases. According to the information reviewed, California Sample Service, Inc. registered as a non-generator of hazardous waste on January 22, 1986. No violations were discovered to be associated with RCRA NonGen / NLR. Local regulatory research was conducted with the appropriate regulatory agencies with regard to the HAZNET listing. According to a response from SCAQMD and research of the FIND database, the subject property was inspected and no other information was identified. Based on the foregoing, the SCAQMD response and FIND database information are not expected to represent an environmental concern for the subject property.

Additionally, adjoining/immediately surrounding properties that are listed on regulatory databases were reviewed (See Section 5.0 of the Phase I ESA). None of the other sites listed on the regulatory database report pose a significant threat to the Project Site as there is no indication of a release at the respective sites, a release has occurred but groundwater has not been impacted, a release has occurred but the case is closed, or the sites are located cross or down gradient of the Project Site and in excess of 1/10 mile from the Project Site.

Phase I Environmental Site Assessment Findings

Recognized Environmental Conditions

The primary purpose of the Phase I ESA was to identify any Recognized Environmental Conditions (RECs) in connection with the Project Site. The term REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The Phase I ESA found the following RECs in connection with the Project Site:

1. The former auto repair operations at 1600 South Flower Street and potential presence of a three-stage clarifier.
2. The former automotive repair operations at 1606 South Flower Street.
3. The former auto repair and auto body operations at 1616 South Flower Street.
4. The current metal fabrication activities and former auto electric services performed at 1625 South Hope Street.
5. The former industrial operations at 462 West Venice Boulevard.

No historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), or *de minimis* conditions were identified in connection with the Project Site.

Asbestos-Containing Materials

Based on the age of the on-site structures, there is a potential for asbestos containing building materials (ACM) at the Project Site, however, no testing was completed as part of the Phase I ESA. Potential ACM include drywall partitions, and mastic associated with roofing materials and floor tiles. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. Should these materials be discovered during construction, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building-occupants. With adherence to regulatory compliance measure regarding proper disposal of ACMs, the Project would have a less than significant impact with respect to ACMs.

Lead-Based Paint

Based on the age of the on-site structures, there is a potential for lead-based paint (LBP) at the Project Site. Painted surfaces were observed in moderate to poor condition during the site reconnaissance. Demolition and removal of the existing buildings would be required to comply with CCR, Title 8, Section 1532 et seq., which requires that all LBP be abated and removed by a licensed lead contractor. In addition, standard handling and disposal practice shall be implemented pursuant to CALOSHA regulations. With adherence to regulatory compliance measures regarding proper disposal of LBP, the Project would have a less than significant impact with respect to LBP.

Phase II Environmental Site Assessment Findings

As recommended in the Phase I ESA, a Phase II Environmental Site Assessment Report (Phase II ESA), was prepared by EFI Global, Inc., dated November 15, 2017 (See Appendix D.2 of this SCEA). A Phase II ESA was prepared to evaluate whether the former on-site industrial operations have significantly impacted the subsurface of the Project Site with volatile organic compounds (VOCs). A total of 10 soil vapor probes were advanced in the interior and the surrounding area of the Project Site structures.

All field activities pertaining to the Phase II ESA were completed on October 26, 2017. Contaminants of potential concern included VOCs in soil vapor. Two VOCs were detected during the assessment: tetrachloroethene (PCE) and trichloroethene (TCE) were detected in the soil vapor. PCE was detected in six soil vapor samples with maximum concentration of 0.65 µg/l (B6-SV-5), which is below the commercial screening level for PCE of 2.0 µg/l. TCE was detected in four soil vapor samples with maximum concentration of 0.28 µg/l (B10-SV-5), which is below the commercial screening level for TCE of 3.0 µg/l. No other VOC analytes were detected above laboratory detection limits. Based on the analytical results, detected concentrations of VOCs are considered *de minimis* and do not represent an unacceptable risk for continued commercial site use. The Phase II ESA has found no evidence of a significant release to the subsurface of the

Project Site that would represent a risk to human health or groundwater beneath the Project Site. Based on the results of the subsurface investigation, the Phase II ESA concludes that no further investigation is warranted at this time. Because the Project Site will be redeveloped for residential occupancy, a Soil Management Plan shall be incorporated during the construction and grading activities (refer to Mitigation Measures MM-HAZ-1, below). In the event that hazardous materials are discovered during the construction phase, the transport and disposal of any hazardous materials and soil shall obtain approval from the Los Angeles Fire Department and Department of Building and Safety. **Therefore, impacts relating to release of hazardous materials would be mitigated to a less than significant level.**

Mitigation Measures:

MM-HAZ-1 Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.
- The Applicant shall provide confirmation that the VOC concentrations in soil vapor meet the residential scenario Department of Toxic Substances Control-modified Screening Levels (DTSC-SLs) established in DTSC's Human Health Risk Assessment (HHRA).
- In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.
- The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission.
- The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following:
    - A qualified environmental consultant shall be present on the Project Site at the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE).
    - Soil Monitoring during soil disturbance shall include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring.

- Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal.
- Impacted soil shall be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
- The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.
- Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

There are three Los Angeles Unified School District (LAUSD) schools located within a one-quarter mile from the Project Site:

- Metro Charter Elementary School, located at 320 W. 15th Street, approximately 0.05 mile northeast of the Project Site;

- Abram Friedman Occupational Center, located at 1646 S. Olive Street, approximately 0.1 mile east of the Project Site; and

- Alliance Dr. Olga Mohan High School, located at 644 W. 17th Street, approximately 0.17 mile west of the Project Site.

The Project has the potential to expose students and staff of the identified schools to potentially hazardous materials, substances, or waste during the construction period. The Project would demolish structures that potentially contain ACMs and LBPs, as discussed above. The demolition is subject to strict regulatory controls that ensure construction activities do not emit hazardous materials in a manner that could impact the schools. Localized construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. As such, the Metro Charter Elementary School would be most affected by the Project's construction activities due to the relatively close distance. The Project would provide appropriate construction measures, such as adhering to the permissible hours of construction and not idling or staging haul trucks in proximity to school facilities to reduce the Project's impacts upon the nearby school facility. Further, the Project's proposed haul route would not pass by any of the identified schools, which would therefore minimize, to the greatest degree possible, hauling impacts to the aforementioned

schools. Implementation of Mitigation Measure MM-HAZ-1, above, and compliance with appropriate regulatory measures would ensure the proper handling and disposal of VOCs, ACMs, and LBP during construction, and thus, impacts related to nearby schools would be less than significant level.

During the operation of the Project, the proposed residential, hotel, and commercial spaces would not result in the routine transport, use, or disposal of hazardous materials. **As such, any operational impacts to nearby schools would be less than significant.**

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant with Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

As stated previously, a Phase I ESA was prepared for the Project Site to acquire and review information regarding the history of activities on the Project Site. The Phase I ESA identified properties on the Project Site listed on the following databases: EDR US Historical Auto Station, RCRA NonGen/NLR, FINDS, ECHO, and HAZNET. The Phase I ESA determined that there are recognized environmental concerns associated with the Project Site. **Compliance with mandatory state and federal regulations and incorporation of Mitigation Measure MM-HAZ-1, above, potential impacts would be reduced to less than significant levels.**

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant project-related impact may occur if the Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Los Angeles International Airport (LAX), located approximately 11 miles southwest of the Project Site. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. **Therefore, the Proposed would not result in a safety hazard for people residing or working in the Project area, and impacts would be less than significant**.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A project would normally have a significant hazardous impact if the project involved possible interference with an emergency response plan or emergency

evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences.

The Project is not located on or near an adopted emergency response or evacuation plan route.[142] Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns impede public access or travel upon public rights-of-way. As discussed below under Checklist Question XVII(d) Transportation, the Project would not create significant impacts along nearby streets that would impact emergency access or response plans. **Therefore, the Project's impacts related to interference with any adopted emergency response plan or emergency evacuation plan would be less than significant.**

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. A significant impact may occur if a project is located in proximity to wildlands areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or significant vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone.[143] **Therefore, no impacts from wildland fires would occur.**

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impacts associated with the Project would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. The closest related project is located within 0.1 mile from the Project Site (see related project No. 5) and potential impacts were evaluated as part of their separate CEQA review processes and were found to result in less than significant impacts associated with hazardous materials and potential for risk of upset. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. **Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the**

[142] *City of Los Angeles, Department of City Planning, Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, accessed November 2021.*

[143] *City of Los Angeles Department of Planning, Zone Information and Map Access System, accessed November 2021.*

Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

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?	☐	☐	☐	☒

IMPACT ANALYSIS

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

Construction Impacts

Three general sources of potential short-term, construction-related stormwater pollution associated with the Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board NPDES Construction General Permit. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, City of Los Angeles Ordinance No. 173,494 further sets procedures for stormwater pollution control for the

planning and construction of development and redevelopment projects. Furthermore, prior to the issuance of a grading permit, the Project shall comply with the Standard Urban Water Mitigation Map (SUSMP) and/or the Site Specific Mitigation Plan to control stormwater pollution as required by Ordinance Nos. 172,176 and 173,494. The appropriate design and application of BMP devices and facilities shall be determined by the Watershed Protection Division of the LA Sanitation & Environment, Department of Public Works.

According to the Geotechnical Report (Appendix B to this SCEA), groundwater was not encountered during exploration, conducted to a maximum depth of 100 feet below the existing grade. The historically highest groundwater level is at a depth of 85 feet below the ground surface.[144] The Project proposes one subterranean level in both high-rise buildings. Therefore, Project construction activities are anticipated to excavate beneath the Project Site. These subterranean levels are anticipated to be approximately 10 feet below the ground surface. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. As such, temporary dewatering will not be required.

As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Project's construction-related water quality impacts would be less than significant.

Operational Impacts

The Project Site is currently developed with four office/retail buildings. The Project Site is completely covered with impervious surfaces. Thus, approximately 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serving the Project Site are located along Flower Street, Hope Street, and the adjacent alleyway that runs along the southern property line of the Project Site. Stormwater flows south along Flower Street and onto a stormwater inlet on the southwest corner of the Project Site. Stormwater along Venice Boulevard flows eastbound, then southbound along Hope Street and onto a stormwater inlet on the southeast corner of the Project Site. There are also two storm drain inlets along the southern property line of the Project Site.[145] These storm drain lines are owned and maintained by the City of Los Angeles. The Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. The Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

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144 *Geocon West, Inc., Proposed High-Rise Development, "1600 South Flower Street" 1600-1623 South Flower Street, 1601-1611 South Hope Street, 426 & 440 W. Venice Boulevard, Los Angeles, California, March 19, 2018. (See Appendix B to this SCEA).*

145 *City of Los Angeles, Bureau of Engineering, Navigate LA, accessed November 2021.*

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CASOO4001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was recently amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.[146]

The Project shall be designed to manage and capture stormwater runoff in compliance with Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook, utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). On-site stormwater management techniques will be designed so that no stormwater runoff leaving the Project Site for at least the volume of water produced by the Stormwater Quality Design Volume (SWQDv). If partial or complete on-site compliance of any type is technically infeasible, the Project Site and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance.[147] For the remaining runoff that cannot feasibly be managed on-site, the Project would be required to implement off-site mitigation on public and/or private land within the same sub-watershed as defined by the MS4 Permit.[148] Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.[149]

In compliance with the LID Plan, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the LA Sanitation & Environment Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event

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[146] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016, accessed November 2021.*
[147] *City of Los Angeles, Ordinance No. 183,833, accessed November 2021.*
[148] *City of Los Angeles, Ordinance No. 183,833, accessed November 2021.*
[149] *City of Los Angeles, Ordinance No. 183,833, accessed November 2021.*

producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.[150]

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. **Therefore, as the Project would be subject to the LID and SUSMP requirements and compliance procedures, operational water quality impacts would be less than significant.**

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

Less Than Significant Impact. Based on the *L.A CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity. As discussed above, the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site.

According to the Geotechnical Report (Appendix B to this SCEA), groundwater was not encountered during exploration, conducted to a maximum depth of 100 feet below the existing grade. The historically highest groundwater level is at a depth of 85 feet below the ground surface.[151] The Project proposes one subterranean level in both high-rise buildings. Therefore, Project construction activities are anticipated to excavate beneath the Project Site. These

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[150] *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016, accessed November 2021.*

[151] *Geocon West, Inc., Proposed High-Rise Development, "1600 South Flower Street" 1600-1623 South Flower Street, 1601-1611 South Hope Street, 426 & 440 W. Venice Boulevard, Los Angeles, California, March 19, 2018. (See Appendix B to this SCEA).*

subterranean levels are anticipated to be approximately 10 feet below the ground surface. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge, nor would the Project Site require temporary dewatering. The Geotechnical Investigation also concluded that it is unlikely that groundwater levels will ever exceed the historic high levels. Based on the reported historic high groundwater levels in the Project Site vicinity (CDMG, 1998), the lack of groundwater in retained borings, and the depth of proposed construction, groundwater is neither expected to be encountered during construction, nor have a detrimental effect on the Project. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Project would not interfere with groundwater recharge. **Therefore, the Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.**

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

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Based on the *L.A CEQA Thresholds Guide,* a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow that would result in a substantial increase in erosion or siltation during construction or operation of the project. The Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. Based on a review of the existing site survey, a review of aerial photographs, and a site reconnaissance in February 2019, the Project Site is approximately 100 percent impervious.[152] Implementation of the Project would not increase site runoff or result in any changes in the local drainage patterns. Further, the Project would comply with LAMC Section 64.70, Stormwater Runoff and Urban Pollution Control. As discussed above, the Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A SWPPP would be prepared and implemented in compliance with the requirements of the Construction General Permit and will identify construction BMPs to control erosion and siltation during construction activities. For project operations, the Project Site would be 100 percent impervious and surface water runoff would be directed to existing storm drain infrastructure. Surface water runoff would be controlled through site design and engineering practices in accordance with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176) and the LID Ordinance (Ordinance No. 181,899), which would ensure the developed site does not contribute to substantial erosion or siltation off-site. **As such, impacts to erosion or siltation would be**

[152] *ALTA/ACSM Land Title Survey, 1601-1625 S. Hope Street and 1600-1616 South Flower Street, prepared by O.K.O Engineering Inc., September 10, 2012, and Google Earth Pro Aerial Imagery dated, March 2019.*

less than significant. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. As stated above in response to Checklist Questions X(a) and (i), the Project Site is approximately 100 percent impervious under existing conditions and would remain 100 percent impervious under proposed conditions. Surface water runoff under proposed conditions would comply with the City's LID Ordinance (Ordinance No. 181,899). Compliance with the LID Ordinance would ensure the Site is developed with BMPs designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater). As such, the volume of post-development surface water runoff would be reduced with the Project as compared to the existing conditions. **Therefore, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and impacts associated with the potential for off-site flooding would be less than significant.**

iii. Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system. As addressed above, the Project Site is completely developed with impervious surfaces and 100 percent of surface water runoff is directed to adjacent street storm drains. Existing storm drain lines serving the Project Site are located along Flower Street, Hope Street, and the adjacent alleyway that runs along the southern property line of the Project Site. Stormwater flows south along Flower Street and onto a stormwater inlet on the southwest corner of the Project Site. Stormwater along Venice Boulevard flows eastbound, then southbound along Hope Street and onto a stormwater inlet on the southeast corner of the Project Site. There are also two storm drain inlets along the southern property line of the Project Site.[153] As discussed in response to Checklist Question X(c)(iii), above, compliance with the City's LID Ordinance would ensure the volume of post-development surface water runoff is reduced under the Project as compared to the existing conditions. Compliance with the LID Ordinance would also ensure BMPs are implemented to treat surface water runoff before being discharged into the storm drain system. **Therefore, the Project would not create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and water quality impacts would be less than significant.**

[153] *City of Los Angeles, Bureau of Engineering, Navigate LA, accessed November 2021.*

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project was located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.[154] The Project Site is located in a highly urbanized area and is currently developed with paved surfaces and contours that direct surface water runoff to existing storm drains. No changes to the local off-site stormwater drainage infrastructure would occur with implementation of the Project. **As such, the Project would not have the potential to impede or redirect floodwater flows and no impact would occur.**

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

No Impact. The Geotechnical Investigation states that the Project Site is not located in a coastal area. Therefore, the potential for tsunamis to adversely impact the Project Site is considered low. Additionally, no major water-retaining structures are located immediately up gradient from the Project Site. Therefore, flooding resulting from a seismically-induced seiche is considered unlikely.[155] **The development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Thus, no impact would occur.**

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

No Impact. As specified above, the Project would comply with LAMC Chapter VI, Article 4.4, Stormwater and Urban Runoff Pollution Control and would be required to obtain coverage under the NPDES General Construction Activity Permit. In addition, the Project would not adversely impact a groundwater management plan because the Project would be developed with Best Management practices to reduce surface water runoff and would not otherwise impede groundwater replenishment in the basin. As discussed above, the Project would comply with the City's NPDES General Construction Activity Permit during construction and designed in conformance with the City's LID Ordinance for new development. **Therefore, neither construction nor operation of the Project would conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.**

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with the related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding area is served by the existing City storm drain system. Runoff from the development sites and adjacent urban uses is typically directed

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154 *City of Los Angeles, Bureau of Engineering, Navigate LA, accessed November 2021.*

155 *Geocon West, Inc., Proposed High-Rise Development, "1600 South Flower Street" 1600-1623 South Flower Street, 1601-1611 South Hope Street, 426 & 440 W. Venice Boulevard, Los Angeles, California, March 19, 2018, at page 8. (See Appendix B to this SCEA).*

into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site or the related project sites, since this part of the City is already fully developed with impervious surfaces.

The Project and each related project would be required to implement a SWPPP and/or SUSMP. Under the requirements of the LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulative contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. **Therefore, cumulative water quality impacts would be less than significant.**

XI. Land Use and Planning

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

IMPACT ANALYSIS

a) Physically divide an established community?

No Impact. A significant impact may occur if a project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

The Project Site is located in an urbanized area of the Central City Community Plan Area and would be consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning designation for the Project Site is C2-2D-O (Commercial Zone) and the General Plan land use designation for the Project Site is Community Commercial. Zones corresponding to the Community Commercial designation are the CR, C2, C4, RAS3, and RAS4 zones.

The Project Site is surrounded by commercial/retail, industrial uses, multi-family buildings, a park, and institutional properties. Properties to the north (north of Venice Boulevard) are zoned [Q]R5-2D-O with General Plan land use designations of High Density Residential. Properties to the east and west of the Project Site are zoned C2-2D-O with land use designations of Community Commercial. The I-10 Freeway to the south of the Project Site is zoned PF-1 with dual land use designations of Public Facilities and Public Facilities-Freeway. As such, no separations of uses or disruption of access between land use types would occur as a result of the Project. **Accordingly, implementation of the Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.**

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project would cause a significant environmental impact due to an inconsistency or in conflict with the General Plan or zoning designations currently applicable to the project site. The Project Site is located within several planning policy areas that have been adopted for the purposes of incentivizing development and/or providing specific development standards that are appropriate for the Project area. Namely, these plans and policy areas include the following: Central City Community Plan area, the City Center Redevelopment Project area, Greater Downtown Housing Incentive Area, the Central City Parking Exception area, the Downtown Adaptive Reuse Incentive Area, a Freeway Adjacent Advisory Notice for Sensitive Uses area, a Metropolitan Transportation Authority (MTA) Project area, and the Enterprise Zone (the Employment and Economic Incentive Program Area). The Project Site is also within a Transit Priority Area pursuant to SB 743 and noted in the City of Los Angeles' Zoning Information File No. 2452.[156] These documents guide development at the Project Site.

Regional Plans

SCAG's Connect SoCal (2020-2045 RTP/SCS)

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). Connect SoCal charts a path

[156] *City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, accessed November 2021.*

toward a more mobile, sustainable and prosperous region by making connections between transportation networks and between planning strategies. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The Project would be consistent with the goals and policies set forth in Connect SoCal, as the Project would redevelop a site that is currently developed with surface parking and would include the construction of a high-rise mixed-use development with multi-family residential and neighborhood-serving commercial uses. The Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Project would increase residential opportunities within a High-Quality Transit Area (HQTA). Furthermore, the Project would add up to 250 residential units to the downtown area, generating approximately 563 residents. The Project's estimated population growth would be consistent with SCAG's future growth projections for the City of Los Angeles. The Project's consistency with Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) is located in Table 1 of Appendix P.

Local Plans

City of Los Angeles General Plan

The Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements, which include a Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, the Land Use Element, and a new Health and Wellness Element. The Land Use Element is comprised of 35 community plans.[157]

The elements that would be most applicable to the Project are the Framework Element, Housing Element, the Mobility Plan, and the Land Use Element. As shown in Table 2 of Appendix P, the Project would promote the goals of the Framework Element. As shown in Table 3 of Appendix P, the Project would promote the goals of the Housing Element and the Mobility Plan. The Project has been designed to comply with all applicable General Plan Elements and zoning designations.

General Plan Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Downtown Los Angeles Community Plan Update

[157] *City of Los Angeles Department of City Planning, General Plan Elements,* http://cityplanning.lacity.org/*accessed November 2021.*

(DTLA 2040) estimates by the year 2040, Downtown will be adding approximately 125,000 people, 70,000 housing units, and 55,000 jobs.

The Project does not conflict with the purposes, intent and provisions of the General Plan Framework Element by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit, which is discussed in more detail in Table 2 of Appendix P.

Mobility Plan 2035 of the General Plan

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, amendment adopted September 7, 2016, is designed to provide a policy foundation for the transportation system within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Ensure that 90% of households have access within one mile to the Transit Enhanced Network by 2035;
- Ensure that 90% of all households have access within one-half mile to high quality bicycling facilities by 2035; and
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

The Mobility Plan 2035 identifies corridors proposed to receive improved bicycle, pedestrian, and vehicle infrastructure improvements. Tier 1 Protected Bicycle Lanes are bicycle facilities that are separated from vehicular traffic. Tier 2 and Tier 3 Bicycle Lanes are facilities on roadways with striped separation. Tier 2 Bicycle Lanes are those more likely to be built by 2035. The Mobility Plan 2035 identifies Flower Street and Venice Boulevard as part of the Neighborhood Enhanced Network. Venice Boulevard is classified as a Tier 2 Bicycle Lane, and Flower Street is classified as a Tier 3 Bicycle Lane.

The Neighborhood Enhanced Network is the network of locally-serving streets planned to contain traffic calming measures that close the gaps between streets with bicycle facilities. Several streets in the project vicinity are included within the planned Neighborhood Enhanced Network, including Hope Street, Hill Street, and Grand Avenue. The Project vicinity generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the local area. With respect to the Mobility Plan's stated objectives, the Project would increase households within one mile to the

Transit Enhanced Network, provide housing within one-half mile to high quality bicycling facilities, and increase the combined mode split of persons who travel by walking, bicycling or transit. As such, the Project would not conflict with the Mobility Plan.

General Plan Land Use Element - Central City Community Plan

The Project would not conflict with the Los Angeles General Plan Land Use Element, which consists of the 35 Community Plan Area plans, of which the property is in the Central City Community Plan. The Project Site is located within the South Park neighborhood sub-area of the Central City Community Plan Area. Therefore, all development activity on-site is subject to the land use policies of the Central City Community Plan (Community Plan). The Community Plan goals and objectives include providing organized growth, a Central City identity, and a full range of housing choices for employees and residents in the downtown area. As described in the Community Plan, the South Park district contains a mix of residential, medical, commercial, and retail uses. Warehouse space in one-story unreinforced masonry buildings is scattered throughout the district. South Park is recognized to be a mixed-use community with a significant concentration of housing.[158]

The Project would revitalize the area with the development of a 22-story hotel with 300 guest rooms and 3,120 square feet of commercial and a 23-story mixed-use residential and commercial building with 250 dwelling units and 10,000 square feet of commercial space. The Project's dwelling units mix would consist of 75 studios, 104 one-bedroom units, 68 two-bedroom units, and 3 three-bedroom units. The Project would also provide a total of 288 automobile parking spaces and 252 bicycle spaces. The Project would provide a variety of on-site amenities, which would be located throughout the ground-floor lobby area, Level 5 podium and amenity area, 9th level terrace, roof terrace, and in private residential balconies. A detailed analysis of the consistency of the Project with the applicable objectives and policies of the Central City Community Plan for Residential and Commercial Land Uses is presented in Table 4 of Appendix P.

As shown in Table 4 of Appendix P, the Project would be consistent with the goals, objectives, and policies set forth in the Central City Community Plan. Therefore, the Project is consistent with the applicable land use and planning policies in the Central City Community Plan.

Redevelopment Plan for the City Center Redevelopment Project Area

Development on the Project Site is further defined by the Redevelopment Plan for the City Center Redevelopment Project ("Redevelopment Plan"). Due to State legislation, the CRA/LA has since been disbanded and there is a successor agency to the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). Pursuant to City Ordinance 183,325 (effective November 11, 2019), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section

[158] *City of Los Angeles Department of City Planning, Central City Community Plan, accessed November 2021.*

11.5.14 and applicable provisions of the Code was transferred to the City. Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted in May 2002 by the CRA/LA and remains effective until May 2032. Specific design considerations from the Redevelopment Plan include: height, development densities, building setbacks, signage, open space and privacy, utilities, parking, and loading facilities. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the City Center area. The City Center area encompasses much of Historic Downtown, City Markets, and South Park.

The Project is located within the South Park Development area of the City Center Redevelopment Project area, which was established by the CRA/LA. The Redevelopment Plan's objective for the South Park Development area is to achieve a mixed-use live/work community, consisting of a housing-commerce community featuring open space.[159] The Project is compatible with other existing and approved high-density housing and mixed-use projects located within the downtown area. The City Center Redevelopment Plan restricts development on the Project Site to an allowable floor area ratio (FAR) of 3 times the buildable area of the site unless a TFAR Request is approved, in which case the maximum FAR is 6 times the buildable area of the Project Site.

The Project is also subject to Section 501 of the Redevelopment Plan (General Controls and Limitations), which requires that all structures comply with Federal, State, and Los Angeles City laws in effect, including the City building codes and ordinances (Redevelopment Plan, pg. 16). The Project's consistency with the objectives in the Redevelopment Plan is further analyzed in Table 5 of Appendix P.

The Redevelopment Plan designates the Project Site as commercial. The Redevelopment Plan establishes five criteria for residential uses within commercial areas, which includes mixed-use commercial and residential in a commercial zone. These criteria are:

1. Promote community revitalization;
2. Promote the goals and objectives of the Plan;
3. Be compatible with and appropriate for the Commercial uses in the vicinity;
4. Include amenities which are appropriate to the size and type of housing units proposed; and
5. Meet design and location criteria required by the Community Redevelopment Agency.

The Project would be consistent with the criteria for residential uses in commercial areas. The Project would revitalize an underutilized site with the development of a high-rise mixed-use hotel building and mixed-use residential and commercial building. As demonstrated in Table 5 of Appendix P, the Project would promote the goals and objectives of the Redevelopment Plan. The Project's land uses are consistent with the surrounding neighborhood that is characterized by

[159] *City of Los Angeles, Community Redevelopment Agency, Redevelopment Plan for the City Center Redevelopment Project, accessed November 2021.*

existing and proposed mixed-use buildings. Additionally, the Project would be consistent with the Project Site's zoning (C2-2D-O) and General Plan land use designation (Community Commercial). As such, the Project would be compatible and appropriate for the commercial and multi-family land uses located in the vicinity of the Project Site. Further, the Project would provide open space for the residents, which would comply with the LAMC requirements for open space. Thus, the Project would include amenities, which are appropriate to the size and type of housing proposed. The Redevelopment Plan refers to the Downtown Design Guide for guidance in building design. The proposed buildings would be designed with the guidance of this document (further discussed below).

Section 512.1 of the Redevelopment Plan allows for a maximum FAR of 3 to 1 in the South Park Development Area. However, Section 512.4 allows for this FAR to be exceeded through TFAR. The Project requests a TFAR approval of more than 50,000 square feet for the total square footage of 452,630 square feet, which is allowed pursuant to the Redevelopment Plan Section 512.4 and LAMC Section 14.5. Based on the Redevelopment Plan Section 512.4, TFAR resulting in higher density development must be appropriate in terms of location and access to the circulation system. TFAR to parcels with reasonable proximity or direct access to a public or private rapid transit station is also particularly encouraged. The Project is well served by transit and is within walking distance of two nearby Metro Stations: the Pico Station and the Grand/LATTC Station. Therefore, the Project would be consistent with the Redevelopment Plan's goal to promote higher density mixed-use development and its overall objectives.

Downtown Design Guide: City of Los Angeles

As discussed earlier, the application of Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." The Project is a mixed-use residential project on an infill site within a Transit Priority Area. While Section 21099 prohibits aesthetic impacts from being considered significant environmental impacts pursuant to CEQA, it does not affect the ability of the City of Los Angeles to implement design review through its ordinances or other discretionary powers. The City's Downtown Design Guide was adopted by the City to guide its design review of projects as part of Site Plan Review. The Project's consistency with such design guidelines is discussed below.

The Downtown Design Guide: Urban Design Standards and Guidelines ("Design Guide") encourages Downtown Los Angeles to develop as a more sustainable and livable community. The focus of the Design Guide is on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit. To achieve this harmony between buildings and public rights-of-way, the Design Guide provides design goals and specific requirements for the design of sidewalks and setbacks, ground floor treatment, parking and access, building massing and street wall, on-site open space, architectural detail, streetscape improvements, signage, public art, and promote civic and cultural life, which

are discussed in further detail below. Additionally, the Design Guide identifies design principles for creating a livable downtown; these principles include:

a) *Employment Opportunities.* Maintain and enhance the concentration of jobs, in both the public and private sectors, that provides the foundation of a sustainable Downtown.
b) *Housing Choices.* Provide a range of housing types and price levels that offer a full range of choices, including home ownership, and bring people of diverse ages, ethnicities, household sizes and income into daily interaction.
c) *Transportation Choices.* Enable people to move around easily on foot, bicycle, transit, or auto. Accommodate cars but fewer than in the suburbs and allow people to live easily without one.
d) *Shops and Services Within Walking Distance.* Provide shops and services for everyday needs, including groceries, day care, cafes and restaurants, banks and drug stores, within an easy walk from home.
e) *Safe, Shared Streets.* Design Streets not just for vehicles, but as usable outdoor space for walking, bicycling and visual enjoyment.
f) *Gathering Places.* Provide places for people to socialize, including parks, sidewalks, courtyards and plazas, that are combined with shops and services. Program places for events and gatherings.
g) *Active Recreation Areas.* Provide adequate public recreational open space, including joint use open space, within walking distance of residents.
h) *A Rich Cultural Environment.* Integrate public art and contribute to the civic and cultural life of the City.

The Project would redevelop an underutilized site in an area largely characterized by commercial and multi-family land uses. The Project includes the development of a hotel building with ground-floor commercial and mixed-use building that would contain residential units and ground-floor commercial/retail. The Project would increase employment opportunities with its hotel building and ground-floor commercial component. The Project would also increase the concentration of employment opportunities downtown and place residents within walking distance of many employment opportunities, shops, and services. The Project's location would reduce dependence on single-occupancy vehicles and promote walking and alternative transportation. The Project would directly increase housing choices in downtown Los Angeles. With approval of the discretionary requests, the Project would provide adequate open space and residential amenities. The Project may include but is not limited to, ground-floor lobby area, a podium and amenity level, an elevated terrace, a roof terrace, and private residential balconies. Additionally, the Project would include plazas and commercial uses that would face toward the public right-of-way, which would promote a pedestrian environment, activate the sidewalk, and provide socializing opportunities. The Project would support the Downtown Design Guide's principles of on-site recreation opportunities and gathering places. The Project would directly support and promote the principles of the Design Guide.

Project Site access and driveway design would be designed and developed in consultation with the Los Angeles Department of Transportation, Department of Building and Safety, and the Los Angeles Fire Department, as required. The Project would provide ground-floor commercial uses and would support a pedestrian-oriented environment, which would help support civic and cultural life. Ground-floor design and treatment (such as providing large storefront windows and beautifying the public right-of-way with street trees and landscaping) would promote pedestrian activity along Flower Street, Hope Street, and Venice Boulevard. The Project Site would be well designed and landscaped and would further enrich the community identity within Downtown Los Angeles. Additionally, primary vehicular access for the residential, hotel, and commercial uses would be provided via full-access driveways along Hope Street and the adjacent alley, which would provide a connection to the subterranean garage and parking podium. Parking for the Project would be contained in the inner portions from the above-grade parking podium and hidden from view. The Project's building siting, parking and access, architectural design, and materials would support the Design Guidelines. Thus, the Project would support the applicable principles and design criteria of the Design Guide.

Los Angeles Municipal Code

Zoning and General Plan Land Use Designations

The Project Site is located within the City of Los Angeles, which is subject to the requirements LAMC. The Project Site consists of approximately 75,503 square feet (1.73 acres). The Project Site is currently improved with four office/retail buildings. The Project includes the construction of a 22-story hotel building with 300 guest rooms and 3,120 square feet of commercial/retail and a 23-story mixed-use residential and commercial building with 250 residential dwelling units and 10,000 square feet of ground floor commercial/retail space.

The Project Site is currently zoned C2-2D-O with a General Plan land use designation of "Community Commercial."

The "D" Limitation for the Project Site reads as follows:

The total floor area contained in all buildings on a lot shall not exceed three (3) times the buildable area of the lot, except that projects with a total floor area not to exceed six (6) times the buildable area of the lot shall be permitted where a development plan is approved by the City Planning Commission pursuant to the notification procedures and schedule set forth in Municipal Code Section 12.24-B.3(b) and the Community Redevelopment Agency Board of Commissioners have determined that the proposed development conforms to the redevelopment plan for the area. (page 86 of Ordinance No. 164,307). The Project is consistent with the "D" Limitation, as discussed in further detail below.

The corresponding zones for Community Commercial land use designation are CR, C2, C4, RAS3, and RAS4 zones. The Project would be comprised of multi-family residential uses, hotel uses, and commercial uses. Hotel, commercial, and multi-family residential uses are permitted on

lots zoned for C2 uses that are located within the Central City CPA and the City Center Redevelopment Project Area. With approval of discretionary requests, the Project would conform to the allowable land uses pursuant to the LAMC.

Density

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(c), the maximum number of dwelling units or guest rooms permitted shall not be limited by the lot area provisions of the LAMC so long as the total floor area utilized by guest rooms does not exceed the total floor area utilized by the dwelling units. The Project Site would be developed with up to 250 residential dwelling units and 300 guest rooms. The hotel floor area of 198,000 square feet would not exceed the proposed residential floor area of 241,510 square feet. Thus, the Project is consistent with this requirement.

Floor Area

The Project Site is located within Height District 2. Height District No. 2 has no building height limit for the underlying zone but limits development to an FAR of 6:1. However, the "D" Classification limits FAR to a maximum of 3:1, or approximately 226,500 square feet based on lot area. Footnote 3 of the Central City Community Plan permits a maximum 6:1 FAR on the Project Site through Transfer of Floor Area. Per the Redevelopment Plan and the TFAR, development of the Project Site is allowed to a maximum FAR of 6:1, or approximately 453,000 square feet. The Project requests a TFAR approval of more than 50,000 square feet to allow for a total square footage of 453,018 square feet, which is permitted pursuant to the Redevelopment Plan Section 512. The Project would include a total floor area of 452,630 square feet, and the addition of buildable floor area through the TFAR request would result in an FAR of 6:1. Thus, with approval of a TFAR request, the Project would be consistent with the allowable FAR.

Open Space

As shown in Table 2.3 in Section 2 of this SCEA, Project Description, the Project would be in compliance with the minimum open space requirements of the LAMC with approval of a reduction. The total amount of open space required by code is approximately 26,925 square feet. The Project is requesting a 10 percent reduction in open space, resulting in 24,233 square feet of required open space. The Project would include 25,768 square feet of open space. As part of the open space requirements, the residential component of the Project includes planting trees at a rate of one tree for every four dwelling units, which requires 63 trees. A total of 63 trees are proposed on-site, which is consistent with LAMC requirements. Thus, with approval of a reduction, the Project would be consistent with the open space requirements of the LAMC.

Setbacks

Per the Greater Downtown Housing Incentive Area, LAMC Section 12.22 C.3(a), no yard requirements apply to lots that are located in the Greater Downtown Housing Incentive Area, except as required by the Design Guide. The Design Guide encourages variations in setbacks

along street frontages. The Project Site has frontage along the Metro Expo Line right-of-way to the west, Venice Boulevard to the north, Hope Street to the east and the I-10 freeway and an unnamed alley to the south.

The Project observes a 15-foot minimum sidewalk on the eastern boundary fronting the Metro Expo line right-of-way, with a 5-foot dedication and a 3-foot easement. Venice Boulevard is classified as a Modified Avenue II in the City's Mobility Plan. Along the northerly frontage along Venice Boulevard, the Project would provide an average 24-foot, 6-inch sidewalk fronting the hotel tower on the west side of the Project Site and a minimum 12-foot sidewalk on the east portion of the Project Site, with a 3-foot easement and 15-foot dedication. An 80-foot linear drop off zone along Venice Boulevard is proposed to allow for passenger loading and unloading. Fronting Hope Street, the building would have a zero-foot setback with a 12-foot minimum sidewalk. With approval of the Vesting Tentative Tract Map request, the Project would be consistent with the required setbacks and sidewalk easements.

Parking

As discussed previously above, the Project meets all of the requisite criteria of a Transit Oriented Infill Project pursuant to SB 743. SB 743, now codified as law under Public Resources Code 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area shall not be considered significant impacts on the environment." Accordingly, the Project's parking impacts shall not be considered significant impacts on the environment as a matter of law under Public Resources Code Section 21099.

Parking for the proposed retail and residential uses on-site will be provided in the second level through third level above grade in the hotel building and in the second level through fourth level above grade in the mixed-use residential building. The Project Site is located within the Central City Parking Exception area (LAMC Section 12.21 A.4(p)). Pursuant to LAMC Section 12.21 A.4, the Project would require a total of 288 parking spaces, including 228 residential spaces, 41 hotel spaces, and 19 commercial parking spaces. The Project plans to provide 288 parking spaces. The Project would be consistent with the applicable parking requirements of the LAMC with approval of all entitlement requests.

The Project would provide on-site bicycle parking and storage spaces for short-term and long-term bike storage. All short-term and long-term bike parking would be spread throughout the ground floor and parking levels near the service elevators and stairways. Pursuant to LAMC Section 12.21 A.16, the Project is required to supply 50 short-term bicycle parking spaces and 174 long-term bicycle parking spaces, for a total of 224 bicycle parking spaces. The Project proposes to provide 252 spaces. Thus, the Project would be consistent with the LAMC requirements for vehicle and bicycle parking.

Metropolitan Transportation Authority Project Area

The Project Site is located within the Metropolitan Transportation Authority (MTA) Project area (ZI-1117). Prior to the issuance of any building permit within 100 feet of a Metro Right of Way (ROW), clearance from the Los Angeles County Metro is required for the Project. MTA clearance would include filing a building permit application and site plan. With clearance and approval from the MTA, the Project would be in compliance with ZI-1117.

Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located adjacent to the Santa Monica Freeway (I-10). The Department of City Planning and the City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways. ZI-2427 is an advisory notice informing planners and the public of the potential health risks associated with sensitive land uses that are within 1,000 feet of a freeway. Areas within 1,000 feet of freeways are known to experience the greatest concentrations of fine and ultrafine particular matter (PM) with greatest concentrations experienced within 500 feet of a freeway. Thus, the future visitors and occupants of the Project may be exposed to relatively poorer air quality emissions from vehicles traveling on the adjacent freeway. While recent court rulings[160] have found that CEQA does not require an analysis of the impacts of the environment on a project, the AQMD and the City Planning Commission continue to recommend that, prior to the approval of a project, the impacts of air pollutants on people who would live in a new project are addressed and appropriately mitigated to the extent feasible. Although not required under CEQA, for informational purposes, a Health Risk Assessment (HRA) was prepared to assess the potential effects of pollutants on individuals who utilize/reside at the Project Site.[161] Carcinogenic risk estimates and chronic noncarcinogenic effects are summarized below.

Freeway Toxic Air Contaminants

TAC emissions from the freeway are generated through combustion of fuel (primarily diesel) which affects ambient air quality throughout the region. TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TAC emissions are regulated at the regional, state, and federal level. Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TAC emissions (based on the statewide average). According to CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. For modeling purposes,

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[160] *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369., accessed November 2021.*

[161] *The Health Risk Assessment for the South Park Mixed Use Development Project, prepared by Air Quality Dynamics, dated April 2019. (See Appendix O to this SCEA.)*

receptors were located on the Project Site based on the conservative assumption that residential receptors could be located anywhere on the Site. The dispersion modeling took into account variable traffic volumes at different times of day.

Carcinogenic Risk Estimates

Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. As a result, the State of California has established a threshold of one in one hundred thousand (1.0E-05) as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65). For a chemical that is known to the State of California to cause cancer, the level posing no significant risk is defined as the level of exposure that would result in not more than one excess case of cancer in 100,000 individuals exposed to the chemical over a 70-year lifetime. This threshold is also consistent with the maximum incremental cancer risk established by the SCAQMD for projects prepared under the auspices of CEQA.

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu g/m^3$) over a 70-year lifetime. The URFs utilized in the assessment and corresponding cancer potency factors were obtained from the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values.*

To represent residential exposures, the assessment employed the U.S. EPA's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). Specifically, activity patterns for population mobility recommended by the U.S. EPA and presented in the Exposure Factors Handbook were utilized. As a result, lifetime risk values for residents were adjusted to account for an exposure duration of 350 days per year for 30 years (i.e., 95th percentile). Additional discussion regarding the use of the 30-year exposure duration is presented in Appendix D to the HRA (See Appendix O to this SCEA). A 9-year exposure duration was additionally assessed to identify risk estimates associated with the average time individuals are reported to reside at a given residence.[162] These values are consistent with CEQA which considers the evaluation of environmental effects of proposed projects in a manner that reflects both reasonable and feasible assumptions (*Laurel Heights Improvement Association of San*

[162] *The analytical assumptions to support an average 9-year residential exposure duration are further explained in Appendix D to the HRA (contained in Appendix O to this SCEA). Based on census data derived from the Integrated Public Use Microdata Series (IPUMS-USA) (2006-2009) over 91% of Californians have lived in their current residence for less than 30 years and over 63% of Californians have lived at their current residence for 9 years or less.*

Francisco, Inc. v. Regents of the University of California). For body weight and inhalation, the assessment employed average adult values of 70 kilograms and 20 cubic meters per day, respectively. As concluded in the HRA, the maximum predicted carcinogenic risk estimate for the maximum exposed residential receptor did not exceed the significance threshold of one in one hundred thousand (1.0E-05) for both the 30 and 9-year exposure scenarios. The maximum predicted carcinogenic risk estimate for the maximum exposed residential receptor was 8.5E-06 for under the 30-year exposure scenario and 2.6E-06 under the 9-year exposure scenario (see Table 4 in Appendix O).

Chronic Noncarcinogenic Effects

An evaluation of the potential noncancer effects of contaminant exposures was also conducted within the HRA study. Under the point estimate approach, adverse health effects are evaluated by comparing the concentration of each compound with the appropriate Reference Exposure Level (REL). Available RELs presented in the Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values were considered in the assessment.

For the residential occupancy, maximum predicted PM_{10} concentrations exceed the significance threshold for the 24-hour averaging time for floor levels 5 through 10. The maximum predicted PM_{10} concentration also exceeds the annual averaging time on floor levels 5 through 11. The $PM_{2.5}$ significance threshold was exceeded on floor levels 5 and 6. For hotel patrons, 24-hour PM_{10} concentrations were exceeded on floor levels 6 through 9. $PM_{2.5}$ concentrations were exceeded on floor level 6. Exceedance of identified significance thresholds are associated with annual and/or 24-hour particulate exposures from the reentrainment of paved roadway dust. As a result, control of particulate impacts may be accomplished by reducing pollutant concentrations within residential and hotel occupancies. By restricting the rate of infiltration, exposures can be controlled to reduce particulate concentrations below SCAQMD's significance thresholds. As stated in Section 99.04.504.6 of the LAMC, mechanically ventilated buildings within 1,000 feet of the freeway are required to provide regularly occupied areas of the building with air filtration media for outside and return air that provides a Minimum Efficiency Reporting Value of 13. The Project's hotel guest rooms and residential dwelling units are subject to the MERV standards in the LAMC Section 99.04.504.6. Moreover, the Project design would locate a majority of the outdoor open space areas at the western end of the Project Site, screened from the freeway to the east by the proposed building. For the PM_{10} and $PM_{2.5}$ size ranges, removal efficiencies are reported to be 90 and 85 percent, respectively. As concluded in the HRA study, incorporation of the identified filter design will reduce particulate exposures below established significance thresholds.

The maximum modeled 1-hour concentration for CO of 0.32446 parts per million (ppm) (371.57064 $\mu g/m^3$) when added to an existing background concentration of 3.2 ppm, will not cause an exceedance of the CAAQS of 20 ppm. For the 8-hour averaging time, the maximum predicted concentration of 0.16804 ppm, (192.44312 $\mu g/m^3$) when added to an existing background level of 1.8 ppm, does not cause an exceedance of the CAAQS of 9 ppm. For NO_2, the maximum 1-hour concentration of 0.02074 ppm (39.01582 $\mu g/m^3$) was predicted. This concentration, when added to a background concentration of 0.0806 ppm, will not cause an exceedance of the CAAQS of

0.18 ppm. Thus, for chronic noncarcinogenic effects, the hazard index identified for each toxicological endpoint totaled less than one for all 30 year and 9-year exposure scenarios. For short duration exposures, the hazard indices for the identified averaging times did not exceed unity. Therefore, noncarcinogenic hazards were predicted to be within acceptable limits. **As such, with adherence to the LAMC, the Project would ensure consistency with the Freeway Adjacent Advisory Notice (ZI-2427).**

Regional and Local Plan Consistency

As discussed in the preceding paragraphs, the Project would not conflict with local and regional plans applicable to the Project Site. **With approval of discretionary requests and adherence to appropriate regulatory compliance measures, any impacts would be less than significant.**

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With regard to land use plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Project, each related project would be subject to a discretionary land use approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential land use impacts such that no significant impacts with regard to adopted land use plans would occur. Also, upon approval of the requested actions, development of the Project together with future forecasted growth would not be anticipated to conflict with the intent of the City General Plan, with other applicable land use plans, or with the LAMC regarding the future development of the Central City community. Therefore, development of the Project together with the related projects would not be expected to result in cumulatively considerable impacts with respect to applicable land use plans and regulations.

With regard to physical land use, it should be noted that all of the related projects are subject to local zoning and land use designations for each of the related project sites. These requirements would regulate future land uses and provide development standards for such land uses that would further preclude potential land use compatibility impacts.

As the Project would not combine with the related projects to substantially or adversely change the existing relationship with offsite communities and would not disrupt, divide, or isolate existing communities, the Project, combined with the related projects, would not result in cumulatively considerable physical land use impacts.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

IMPACT ANALYSIS

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is zoned C2-2D-O, the "O" designation indicates the Project Site is located in an oil drilling district, specifically the Los Angeles Downtown Oil Field.[163] The Project Site is not located within a Mineral Resources Zone 2 (MRZ-2).[164] The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. The Project Site is currently developed with four office/retail buildings. Development of the Project Site would not block or hinder access or availability of mineral

[163] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Oil field and oil drilling areas in the City of Los Angeles, September 1996.*

[164] *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

resources. **Therefore, the development of the Project would not result in the loss of availability of a known mineral resource, and no impact would occur.**

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a MRZ-2 zone. As such, the Project Site is not currently used for the extraction of mineral resources. Historic research also shows that the Project Site has not been historically used for the extraction of mineral resources. Development of the Project Site would not block or hinder access or availability of locally important mineral resources. **Therefore, no impact to locally important mineral resources would occur.**

Cumulative Impacts

No Impact. As discussed above, the Proposed would have no impact on mineral resources. It is not known if any of the related projects would result in the loss of availability of known mineral resources. Each related project would be required to comply with the Los Angeles CEQA guidelines and execute required project site studies. **Nevertheless, the Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have no cumulative impact on mineral resources.**

XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

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

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

> L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
>
> L_{max} – The maximum instantaneous noise level experienced during a given period of time.
>
> L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with more noisy urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).[165]

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.[166]

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflecting on barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass).[167] Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. The normal noise attenuation within residential

[165] *California Department of Transportation, Technical Noise Supplement, accessed November 2021.*

[166] *California Department of Transportation, Technical Noise Supplement, accessed November 2021.*

[167] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, accessed November 2021.*

structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.[168]

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations fronting the adjacent residential and educational uses as the most likely sensitive receptors to experience noise level increases during construction and at the major intersections surrounding the Project Site. The detailed noise monitoring data are presented in Appendix E, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.13, Existing Ambient Noise Levels in Project Site Vicinity. As shown in Table 4.13, the ambient daytime noise in the vicinity of the Project Site ranges from 66.8 to 75.0 L_{eq}. The maximum instantaneous noise level during the three daytime 15-minute recordings was 98.2 dB L_{max} at Location C, where a fire truck with sirens passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels were pedestrians and vehicle traffic during the daytime hours, including the Metro rail, cars, motorcycles, buses, and delivery trucks. The ambient evening noise in the vicinity of the Project Site ranges from 65.5 to 71.5 L_{eq}. The maximum instantaneous noise level during the evening measurements was 87.1 dB L_{max} at Measurement Location A. The dominant source of noise at Location A is traffic on the I-10 Freeway.

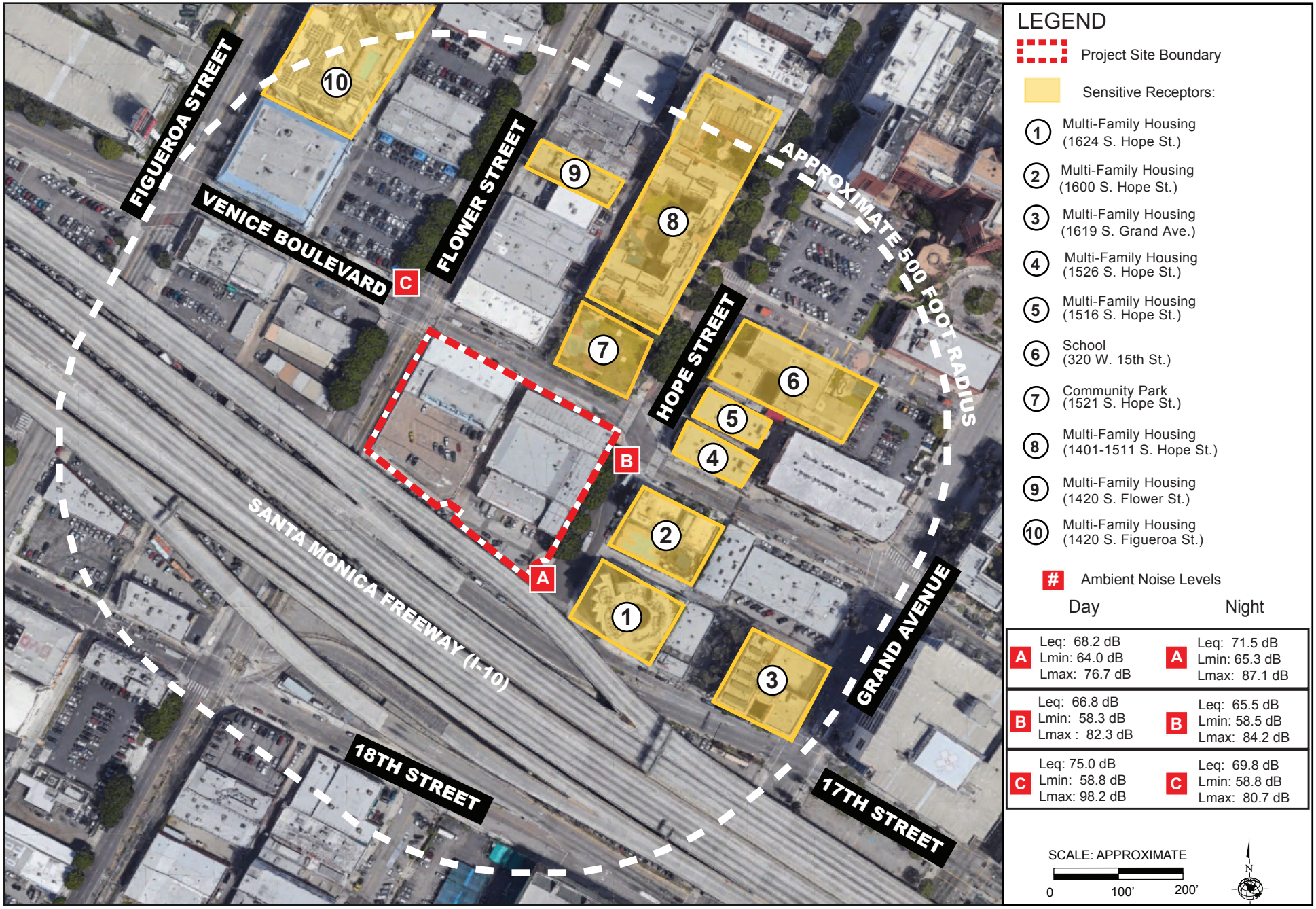
Table 4.13
Existing Ambient Noise Levels in the Project Site Vicinity

No.	Location	Primary Noise Sources	Noise Level Statistics [a]			
			Time	L_{eq}	L_{min}	L_{max}
A	On the southeast corner of the Project Site, on the west side of Hope Street	Light vehicle traffic, 10 Freeway	Daytime	68.2	64.0	76.7
			Evening	71.5	65.3	87.1
B	On the northeast corner of Hope Street and Venice Boulevard	Vehicle traffic, delivery trucks, buses, light pedestrian activity	Daytime	66.8	58.3	82.3
			Evening	65.5	58.5	84.2
C	On the northeast corner of Venice Boulevard and Flower Street	Heavy vehicle traffic, buses, Metro rail, fire truck	Daytime	75.0	58.8	98.2
			Evening	69.8	58.8	80.7

[a] *Daytime noise measurements were taken on Monday, September 10, 2018 between approximately 10:30 and 11:30 a.m. at each location for a duration of 15 minutes. Evening noise measurements were taken on February 14, 2019 between approximately 9:30 and 10:30 p.m. See Appendix E of this SCEA for noise monitoring data sheets.*

Parker Environmental Consultants, 2019.

[168] *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, accessed November 2021.*



Source: Google Earth, Aerial View, 2018; Parker Environmental Consultants.

Figure 4.2
Noise Monitoring and Sensitive Receptor Location Map

Sensitive Receptors

Several noise sensitive land uses are located in the vicinity of the Project. For purposes of assessing noise impacts on sensitive populations, the sensitive receptors in close proximity (within 500 feet) to the Project Site were identified. Table 4.14 below provides a summary of the sensitive receptors by address and land use and their respective proximity to the Project Site.

Table 4.14
Summary of Noise Sensitive Land Uses within 500 Feet of the Project Site

ID	Address	Land Use / Description	Distance to Project Site
1	1624 S. Hope Street	Multi-Family Housing / New Carter Apartments	80 ft.
2	1600 S. Hope Street	Multi-Family Housing / Hope Street Family Center	80 ft.
3	1619 S. Grand Avenue	Multi-Family Housing / Young Apartments	330 ft.
4	1526 S. Hope Street	Multi-Family Housing	80 ft
5	1516 S. Hope Street	Multi-Family Housing	110 ft.
6	320 W. 15th Street	School / Metro Charter School	150 ft.
7	1521 S. Hope Street	Community Park / Venice Hope Park	60 ft.
8	1401-1511 S. Hope Street	Multi-Family Housing / Villa del Pueblo	160 ft.
9	1420 S. Flower Street	Multi-Family Housing	315 ft.
10	1420 S. Figueroa Street	Multi-Family Housing / Avant Apartments	350 ft.
Source: Parker Environmental Consultants, 2019.			

The locations of these land uses relative to the Project Site are depicted in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map. In terms of assessing construction-generated vibration impacts, there are no buildings that are directly abutting the Project Site that would be potentially susceptible to structural vibration impacts from the construction activities proposed for the Project.

IMPACT ANALYSIS

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project would generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of the standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Impacts

On-Site Construction Noise

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, this noise limitation does not apply where compliance is technically infeasible. The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the *L.A. CEQA Thresholds Guide* for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Project would require the use of heavy equipment for demolition, grading, and excavation, the installation of utilities, paving, and building construction. The Project's construction noise levels were estimated using the noise prediction and reference noise levels for construction equipment usage by phase based on the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM, Version 1.1 (2006)). The average (hourly L_{eq}) construction noise levels by phase are based on the quantity, type, and usage factors for the construction equipment anticipated to be used during each phase of construction. The predicted construction noise levels at each of the sensitive receptors were then estimated based on respective distance between the source and the receptor and other factors that would affect the noise levels such as intervening structures or barriers that provide sound attenuation.

Table 4.15, below, shows the highest estimated exterior construction noise levels at each of the 10 identified sensitive receptor locations. The Project's construction noise levels at Sensitive Receptor Nos. 3, 9 and 10 would be below existing ambient noise levels, and thus would not be significantly impacted by the Project. Construction noise levels at Sensitive Receptor No. 6 and 8 would be less than significant as construction noise levels would not exceed 5 dBA above ambient. Construction noise levels at Sensitive Receptor No. 1, 2, 4, 5 and 7, however, would exceed a 5-dBA increase over the ambient noise levels and thus could cause a significant impact. As such, Mitigation Measure MM-N-4 would require the contractor to install a temporary noise barrier during construction to attenuate the Project's construction noise levels by a minimum of -12.5 dBA along the northern property line and a minimum of -10 dBA along the eastern property line. Construction noise attenuation techniques and products discussed in Mitigation Measure MM-N-4, such as plywood barriers and or chain link fencing wrapped with weatherproof noise insulating sound blankets will be utilized to create the temporary noise barrier during construction.

Table 4.15
Estimated Exterior Construction Noise at Nearest Sensitive Receptors

ID [a]	Address/Land Use	Existing Exterior Ambient Noise (dBA L_{eq})	Unmitigated Construction Noise Levels (dBA L_{eq})[b]	Construction Noise Significance Criteria (dBA L_{eq})	Construction Noise Impact Above Threshold (dBA L_{eq})
1	1624 S. Hope Street Multi-Family Res./New Carter Apts.	68.2	81.8	73.2	8.6
2	1600 S. Hope Street Multi-Family Res./Hope St. Family Ctr.	68.2	81.8	73.2	8.6
3	1619 S. Grand Avenue. Multi-Family Res./Young Apts.	68.2	54.5	73.2	0.0
4	1526 S. Hope St. / Multi-Family Res.	66.8	81.8	71.8	10.0
5	1516 S. Hope St./ Multi-Family Res.	66.8	79.0	71.8	7.2
6	320 W. 15th Street School/ Metro Charter School	66.8	72.0	71.8	0.2
7	1521 S. Hope Street Neighborhood Park/ Venice Hope Park	66.8	84.3	71.8	12.5
8	1401-1511 S. Hope Street Multi-Family Res. / Villa del Pueblo	66.8	75.8	71.8	4.0
9	1420 S. Flower St. / Multi-Family Res.	75.0	54.9	80.0	0.0
10	1360 S. Figueroa Street Multi-Family Res./Avant Apartments	75.0	54.0	80.0	0.0

Notes

[a] *See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.*

[b] *Represents the highest noise level to occur during any one phase of construction based on the Construction Noise Calculation Worksheets presented in Appendix E, Noise Calculation Worksheets.*

Source: Calculations based on Federal Highway Administration, Roadway Construction Noise Model (2006), See Appendix E for Construction Noise Calculation Worksheets.

Mitigation Measure MM-N-4 would be capable of effectively attenuating construction noise produced by heavy equipment and activities on the ground level, but would not be effective in mitigating noise impacts during structural framing and architectural coating. As such, Mitigation Measure MM-N-5 requires the contractor to employ the use of temporary noise barriers to be placed at the source of noise sources on floors located above the first level to ensure noise levels are appropriately attenuated so as not to exceed a 5 dBA increase at nearby institutional and residential land uses. A noise reduction of 12.5 dBA would be sufficient to reduce construction noise levels from above grade noise sources during the building construction and architectural coating phases to below the thresholds of significance. As such, construction noise impacts would be less than significant after mitigation.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

The Connect SoCal (2020-2045 RTP/SCS) identifies a number of noise attenuation measures that would be effective in reducing noise impacts for general construction projects within the region and states that those measures or other comparable measures may be identified by the Lead Agency. As such, based on the quantitative noise analysis presented above, the applicable noise reduction mitigation measures have been identified in this report to mitigate noise impacts at the Project Site. The proposed measures are specific to the Project Site and are generally consistent with those measures identified in the Connect SoCal (2020-2045 RTP/SCS). As such they would be equally effective in mitigating construction noise impacts. As noted in Mitigation Measures MM-N-1 through MM-N-6, below, noise control efforts to limit the construction activities' hours of construction, incorporate noise shielding devices and sound mufflers and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts by at least 12.5 dBA to below the thresholds of significance. The Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Project. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays or any federal holidays. The construction activities associated with the Project would comply with these LAMC requirements. **Therefore, with mitigation and compliance with the City's applicable codes the Project's construction noise levels would be reduced to the maximum extent feasible and would reduce impacts to a less than significant impact with respect to generating a substantial temporary increase in ambient noise levels in the vicinity of the project.**

Mitigation Measures

MM-N-1 To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

MM-N-2 The project contractor shall use power construction equipment with noise shielding and muffling devices.

MM-N-3 The project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA. The

sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material.

MM-N-4 During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

MM-N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any complaints shall be rectified within 24 hours of their receipt.

MM-N-6 The Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school. Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Hope Street, north of the Venice Boulevard, adjacent to the school, during school hours.

Off-Site Construction Noise

In addition to the on-site construction noise sources addressed above, which are regulated under the City's Noise Ordinance, other noise sources may be generated off-site resulting from materials delivery, concrete mixing trucks, haul trucks, and other trucks from workers accessing the Project Site during construction. The highest of these noise sources would be generated by haul trucks for demolition and excavation, and concrete mixing trucks during foundation activities, which would collectively occur during the first four months of construction. It is anticipated that the proposed haul route for transporting soil to the Sunshine Canyon Landfill would travel east on Venice Boulevard to Grand Avenue, south on Grand Avenue to 17th Street, and west on 17th Street to the I-10 Freeway on-ramp. Inbound haul trips would exit the I-10 Freeway at Olive Street, proceed north on Olive Street to 17th Street, and take 17th Street eastbound to the Project Site driveway on Hope Street. Construction and demolition haul trucks transporting material to either the Downtown Diversion facility or the Azusa Landfill would travel eastbound on Venice Boulevard to Grand Avenue, southbound on Grand Avenue to 18th Street, and east on 18th Street to the Los Angeles Street - I-10 Freeway on-ramp. Cement trucks from one of the ready-mix cement facilities in southeast Los Angeles would utilize the same eastbound route to the I-10 Freeway as described above, exiting on Alameda Street.

Based on the total volume of construction/demolition debris, the highest number of haul trips would occur during the grading/excavation phase. Assuming an average of 14 cubic yards per haul truck, the debris export during the one-month grading phase would generate approximately 4,000 one-way haul trips, distributed over an approximate 26-day period. This would result in approximately 154 haul trips per day during the anticipated hauling hours. Additionally, the highest number of delivery trucks would occur during the building foundations phase, which would occur for the first two months of the building constructions phase. This phase would involve the delivery of cement mixer trucks and concrete pouring on the Project Site in order to lay the foundations for the Project. It is anticipated this phase would involve 4,652 loaded cement trucks resulting in 9,304 one-way trips, distributed over an approximate 53-day period. This would result in 176 one-way trips per day during the anticipated construction hours. The surrounding roadways identified in the proposed haul route and Project vicinity are characterized with heavy vehicle traffic, and the addition of haul truck trips or delivery trucks per day would not result in any significant roadway noise impacts. As such, the temporary noise increase from haul truck trips and cement delivery trucks would not significantly increase noise in the Project area. As such, the hauling and delivery activities during construction would result in a less than significant impact to off-site noise receptors.

Operational Noise Impacts

A project would normally have a significant operational noise impact if the Project causes the ambient noise levels to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category as shown in Table 4.16, Community Noise Exposure Level (CNEL), or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dBA CNEL at sensitive receptors where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation. The significance criterion for each sensitive receptor is shown in Table 4.17, Estimated Operational Noise Levels and Composite Noise Levels.

Table 4.16
Community Noise Exposure Levels (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---

[a] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
[b] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.
Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

HVAC Equipment Noise

Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the on-site and surrounding buildings in the Project vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Based on a reference noise level of 71 dBA L_{eq} at the source and the respective distances to the sensitive receptors, the maximum noise level produced by the HVAC equipment is anticipated to be 33.36 dBA L_{eq} at Sensitive Receptors No. 1 and No. 2, the two closest receptors. As this noise level is significantly below the ambient noise levels, the sound of

HVAC equipment would not be audible at the neighboring sensitive receptors. Therefore, noise impacts from HVAC equipment would be less than significant.

5th Level Amenity Deck Noise

The Project would include amenity decks on the 5th levels of the hotel and residential tower structures. The amenity deck on the hotel structure is proposed as an outdoor event center with an occupancy area of 5,200 square feet. Assuming an average occupancy load of 25 square feet per person, this space would be able to accommodate approximately 208 persons. The amenity deck on the residential structure is proposed as a residential outdoor amenity space with a pool deck, barbecue area, tables, and seating areas. The residential amenity deck area is approximately 9,630 square feet and, based on an average occupancy load of 50 square feet per person, this space is anticipated to accommodate up to 193 persons.[169] The intended use of the residential amenity deck and outdoor courtyards would be to have the residents and guests to lounge outside and utilize the available amenities.

There is no objective criterion for analyzing outdoor human activities within amenity spaces (i.e., crowd noise). The only applicable criteria the LAMC code provides is LAMC Section 116.01, which states that it shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud, unnecessary and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. It is not expected that the intended uses would violate the prohibition of "loud, unnecessary and unusual noise" criteria.

Based on the maximum occupancy loads of the outdoor spaces on the 5th level amenity decks and reference noise levels of 65 dBA and 62 dBA (L_{eq} at a distance of 3.3 feet) for a male and a female speaking in a raised voice, respectively, noise levels from these outdoor spaces were estimated at each of the respective sensitive receptors based on 50 percent of the occupancy speaking at the same time with the crowd comprised of 50 percent males and 50 percent females.[170] The combined noise levels from activities on both outdoor amenity decks at the same time are summarized in Table 4.17, below. Noise levels from the courtyard activities would not exceed the 5-dBA threshold above ambient at any of the sensitive receptors. Therefore, noise impacts associated with operational activities from the outdoor courtyards would be less than significant.

Loading Dock/Trash Collection/Parking Structure Noise

The loading entrance for refuse trucks to enter the Project Site would be located along Olympic Boulevard on the northeast corner of the Project Site. The Project includes an enclosed area within the parking structure for refuse and recycling collection that would block the line of sight to surrounding sensitive receptors. Noise from loading and trash collection would be temporary and

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169 Due to the different configurations of the hotel outdoor event deck and the residential amenity deck, the outdoor hotel event area has a higher occupancy load.

170 Cyril M. Harris, Handbook of Acoustical Measurements and Noise Control, Third Edition, 1991.

occur only a few times a week. Additionally, the noise levels would be isolated within the ground level parking structure, which would result in a less than significant noise impact to surrounding sensitive receptors. As these sources would be entirely contained within the proposed parking structures they would not contribute to the exterior ambient noise levels in the Project vicinity.

The primary entrance/exit to the parking garage would be from Hope Street at the southeast corner of the Project Site. The Project would provide parking spaces in two levels of above grade parking in the hotel building and in three levels of above grade parking in the mixed-use residential and commercial building. Parking structures generate noise from vehicles engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the garage structures would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. Noise levels are anticipated to be highest during the A.M. and P.M. peak hours, corresponding to the volumes of project-generated traffic as reported in the Project's Transportation Study. Operational-related noise generated by motor driven vehicles within the Project Site is regulated under the LAMC. Specifically, with regard to motor driven vehicles, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. As such, noise impacts from the Project's parking areas would be less than significant.

Composite On-Site Noise Levels

On-site noise sources associated with the Project would include mechanical HVAC equipment and outdoor amenity activities. Since loading and parking noise would be completely enclosed, noise levels from these areas would not significantly increase ambient noise levels. Composite noise levels were estimated to analyze the impact from the combination of all on-site noise sources from the Project Site to the surrounding sensitive receptors. Table 4.17, Estimated Operational Noise Levels and Composite Noise Levels, shows the noise levels from all on-site sources and estimates the total composite noise levels at the surrounding sensitive receptors from the Project Site. When analyzed together, the Project would have a maximum noise level of 75.0 dBA Leq for Sensitive Receptor Nos. 9 and 10, the multi-family housing fronting Flower Street and Figueroa Street. This analysis is conservative since these noise levels represent the maximum capacities in the 5th Level Amenity Deck. **Therefore, the Project would not increase ambient noise levels by 5 dB, and a less than significant impact operational noise impact would occur.**

Table 4.17
Estimated Operational Noise Levels and Composite Noise Levels

ID# [a]	Ambient Noise Level	5th Level Amenity Deck Noise Levels	HVAC Equipment Noise Level	Composite Noise Level	Significance Criteria (dBA L_{eq})	Significant Impact?
1	68.20	64.19	33.36	69.65	73.20	NO
2	68.20	64.19	33.36	69.65	73.20	NO
3	68.20	37.19	24.73	68.20	73.20	NO
4	66.80	63.22	18.46	68.38	71.80	NO
5	66.80	62.51	17.14	68.18	71.80	NO
6	66.80	61.39	12.11	67.90	71.80	NO
7	66.80	69.64	4.10	71.46	71.80	NO
8	66.80	64.75	0.00	68.90	71.80	NO
9	75.00	39.57	0.00	75.00	80.00	NO
10	75.00	38.57	0.00	75.00	80.00	NO

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006 and Caltrans' Technical Noise Supplement, September 2013. See Appendix E to this SCEA. Parker Environmental Consultants, 2022.

Off Site Traffic Noise

The Project would increase traffic volumes on the surrounding roadways, which in turn has the potential to increase roadway noise. Based on the principles of roadway noise, it would take a doubling of the roadway's traffic to generate a perceptible increase (3 dBA) in the ambient roadway noise volume.[171] According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the Project's mobile noise impacts can be assumed to be less than significant. According to the Project's Non-CEQA Transportation Study, the proposed development would result in a net increase of 1,778 net daily vehicle trips, including 168 AM peak hour trips and 91 PM peak hour trips. For purposes of analyzing the Project's traffic noise impacts, the traffic volumes at the two adjacent intersections analyzed in the Project's Transportation Study, Intersection No. 9: Flower Street and Venice Boulevard and Intersection No. 13: Hope Street and Venice Boulevard were analyzed. It is estimated that approximately 29,150 daily trips occur at the intersection of Flower Street and Venice Boulevard and approximately 17,650 daily trips occur at the intersection of Hope Street and Venice Boulevard. The Project's estimated 1,778 daily trips would represent a small percent increase in traffic volume at these intersections. Therefore, the Project would not double the traffic along the closest intersections and thus would not exceed the 3-dBA CNEL threshold of significance at the nearby study intersections and roadways. **Thus, the Project's operational mobile source noise impact would be less than significant.**

[171] *Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment, accessed November 2021.*

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

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people.[172] Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Impacts

Excavation and earthwork activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as neither the City of Los Angeles nor the County of Los Angeles have an adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts

[172] *Federal Transit Administration, Office of Planning and Environment Federal Transit Administration, Transit Noise and Vibration Impact Assessment, accessed November 2021.*

relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 4.18, below.

Table 4.18
Construction Vibration Damage Criteria

Threshold Criteria	PPV (in/sec)	Approximate RMS velocity in decibels (VdB) (re 1 micro-inch/second)
Building Category		
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
Source: Federal Transit Administration, Office of Planning and Environment *Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Table 12-3) May 2006.*		

Table 4.19, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 4.19 vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4.19
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.										

Structural Vibration Impacts

In terms of construction vibration impacts on buildings, there are no buildings that are adjacent to the Project Site's property lines. The Project Site is bordered by streets, an alleyway and the I-10 Freeway overcrossing to the south, and the Metro right-of-way light rail corridor to the west. The Metro light rail right-of-way easement along Flower Street is over 18 feet from the proposed hotel structure's building footprint. The I-10 Freeway is located over 30 feet to the south of the Project

Site, across a vacant easement. As shown in Appendix E, the Project's maximum expected vibration impacts at 18 feet and 30 feet, respectively, would range from 0.13 to 0.07 PPV(in/sec), which is below the structural impact threshold for building damage to reinforced concrete, steel, or timber structures. Furthermore, the Project would incorporate SCAG Mitigation Measure PMM-NOISE-2 (d) to (f), which would further reduce the Project's less than significant groundborne vibration impacts.[173] **As such, the Project's construction activities would have no groundborne vibration impacts upon any surrounding structures.**

Mitigation Measures:

PPM-NOISE-2 **Groundborne Vibration.** The Project would incorporate the following measures from the SCAG RTP/SCS EIR Mitigation Measure PPM-NOISE-2:

(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.

Operation

The Project is a mixed-use development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) along Flower Street, Hope Street, and Venice Boulevard, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, the collection of refuse would occur within the enclosed parking structure which would effectively attenuate groundborne vibration and noise impacts. **As such, vibration impacts associated with operation of the Project would be less than significant.**

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

No Impact. A significant impact may occur if the Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources

[173] *The Project construction would not include any pile driving, which is typically associated with high vibration impacts. As such, the measures recommended in PMM NOISE-2 (a), (b), and (c) are not applicable to the Project.*

of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not within any airport land use plan or airport hazard zone. **The Project would not expose people to excessive noise levels associated with airport uses. No impact would occur.**

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects identified in Section 2, Project Description, of this SCEA, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Project study area and it is impossible to predict with any degree of certainty the occurrence of concurrent construction activities. Therefore, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period noise for the Project and each related project (that has not yet been built) would be localized and mitigated on a project-by-project basis. The closest related projects to the Project Site are Related Project No. 5 (1410 S. Flower Street) and Related Project No. 9 (1411 S Flower Street), which are located over 400 feet north of the Project Site. Both of these related projects are separated from the Project Site by intervening structures that would block the line of sight and contain construction noise such that cumulative noise impacts would not occur. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced with feasible mitigation. As demonstrated above, Project construction noise impacts, with the implementation of Mitigation Measures MM-N-1 through MM-N-5, would result in less than significant impacts. As such, the Project's construction noise impact would not be cumulatively considerable. **Additionally, because each related project would be required to comply with the City's noise ordinance, cumulative impacts associated with construction noise would be mitigated to less than significant levels.**

XIV. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

IMPACT ANALYSIS

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if the project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing unplanned growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause unplanned growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 3, 2020, SCAG's Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) - a plan that the Regional Council now calls Connect SoCal. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Based on the regional growth projections in Connect SoCal, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). Employment within the City is expected to grow by 287,600 jobs, which is an approximate 16 percent increase in employment between 2016 and 2045. SCAG's population, housing, and employment projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 4.20, below.

Table 4.20
SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
Households			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
Employment			
Region	**2016**	**2045**	**%Growth (2016-2045)**
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%

Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.

The Project is an infill development project within the Central City Community Plan Area within the City of Los Angeles. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a population increase to 4.77 million persons by 2045. As shown in Table 4.20, above, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,621,000 households, or

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

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the Project area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process.

Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts would not result from construction of the Project. **Therefore, construction-related population growth impacts would be less than significant.**

Operational Impacts

The Project would remove four office/retail buildings and would replace them with a new residential, hotel, and retail development. The Project would include 250 dwelling units, 300 hotel guest rooms, and 13,120 square feet of commercial space.

Population generation is shown in Table 4.21 and employee generation is shown in Table 4.22. It is estimated that the Project would generate approximately 563 residents and roughly 192 employees.

Table 4.21
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Project			
Apartments	250 dwelling units	2.25 person / DU [a]	563
		Total Increase in Population	**563**

Note: DU = dwelling unit
[a] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.
Source: Parker Environmental Consultants, 2023.

Table 4.22
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates [a]	Total Employees
Project			
Hotel	300 rooms	0.5 employee / room	150
Retail (Restaurant)	3,120 sf	4 employees / 1,000 sf	12
Office	10,000 sf	3 employees / 1,000 sf	30
		NET Total Project Employees	**192**

Note: sf = square feet
[a] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.
Source: Parker Environmental Consultants, 2023.

Based on the community's current household demographics (e.g., an average of 2.25 persons per household for the City of Los Angeles), the construction of 250 additional dwelling units would result in an increase in up to approximately 563 net permanent residents in the City of Los Angeles.[174] The proposed increase in housing units and population would be consistent with the SCAG forecast of 426,000 additional households and approximately 837,500 persons in the City of Los Angeles between 2016 and 2045.

Localized Growth Forecasts

Table 4.21 shows the SCAG, population and housing growth for the City of Los Angeles to the year 2045.

The Project's 250 new units and estimated 563 future residents would be well within SCAG estimates of growth for the City between 2016 and 2045. Therefore, the Project would result in a less than significant impact with respect to population, housing, and employment growth.

Additionally, the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout, and that would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. **Therefore, impacts related to unplanned population growth would be less than significant.**

[174] *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, accessed November 2021.*

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site is developed with four office/retail buildings. No residential units exist on-site. **As such, the Project would not displace any existing people or housing. Therefore, no impact would occur.**

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional residential related uses to the Project Site area. Any residential related projects would result in direct population growth in the Project Site area.

As discussed in Question XIV(a), the Project would not exceed the growth projections of SCAG's Connect SoCal plan for the City of Los Angeles subregion. Because the Project would not displace any residents, and population growth potentially associated with the Project has already been anticipated per SCAG projections, the Project's population growth would not be cumulatively considerable. Based on the related projects list provided in Section 2 of this SCEA, Project Description, there are 1,144 residential dwelling units that are either under construction, approved, or proposed within the Project area. Based on an approximate 2.25 persons per household, the related projects would generate up to 2,574 permanent residents. The generation of the Project and related project's housing units and resident population would be within SCAG forecasts for 2045. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

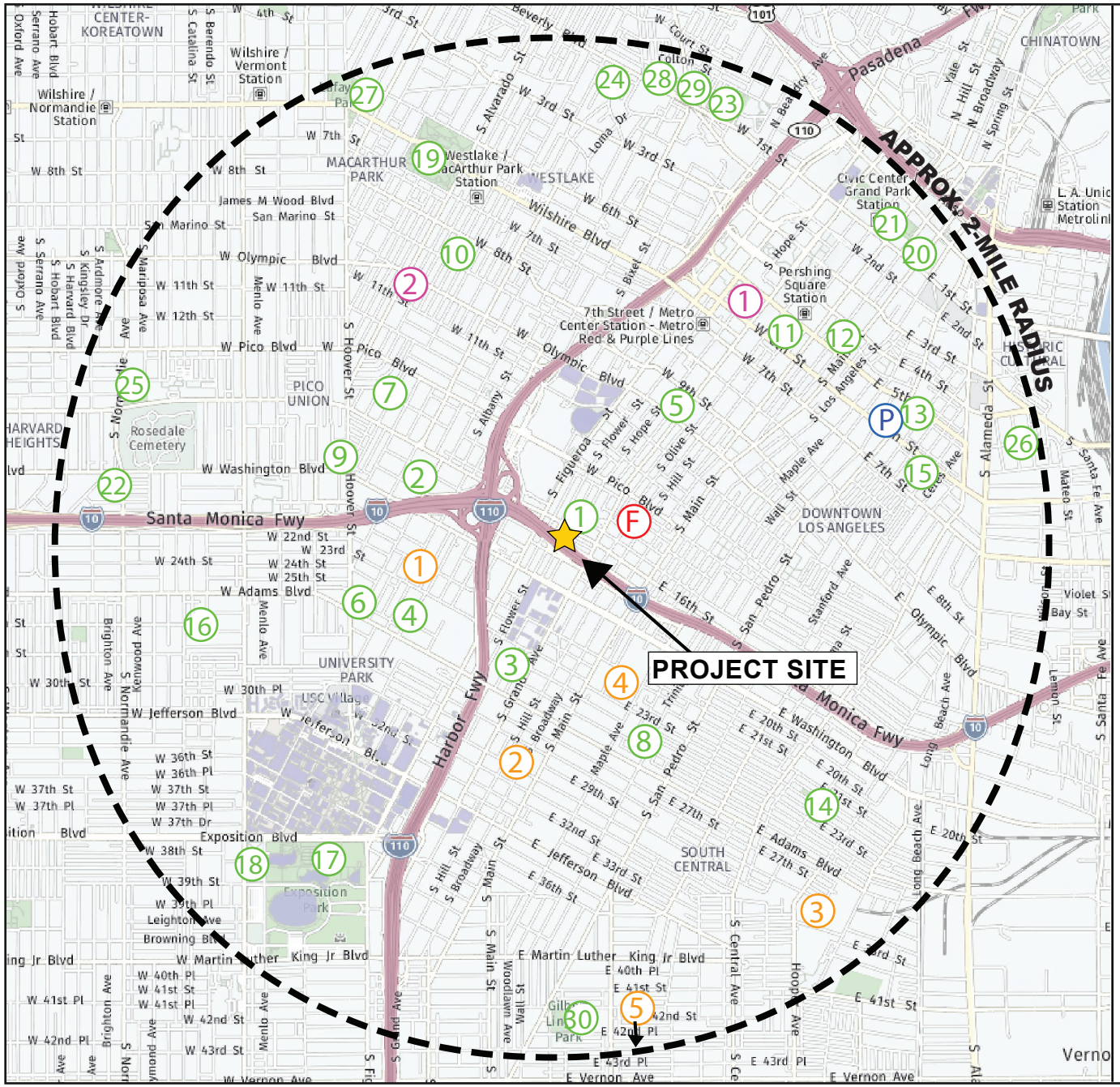
With respect to population growth from permanent employment, jobs in commercial/retail land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial land uses. **As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.**

XV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
ii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

The location of public services (including fire services, police protection services, schools, parks, and libraries) in the Project vicinity and that service the Project Site are shown in Figure 4.3, below.



LEGEND

F LAFD Station No. 10

P Central Community Police Station

Schools
1. Norwood Street Elementary School
2. John Adams Middle School
3. Thomas Jefferson Senior High School (includes Nava College Preparatory Academy)
4. Santee Education Complex
5. Dr. Maya Angelou Community Senior H.S.

Parks
1. Venice Hope Park
2. Toberman Recreation Center
3. Orthopeadic Hospital Playground
4. Saint James Park
5. Grand Hope Park
6. Hoover Recreation Center
7. Alvarado Terrace Park
8. Trinity Recreation Center
9. Pico Union Park
10. Hope and Peace Park
11. Pershing Square Park
12. Spring Street Park
13. San Julian Park
14. Central Park, Recreation Center, Pool
15. 6th and Gladys Street Park
16. Richardson Family Park
17. Exposition Park
18. Jesse Brewer Jr. Park
19. MacArthur Park
20. City Hall Park Center
21. Grand Park
22. West Adams Heights Park
23. Vista Hermosa Park
24. Unidad Park (Beverly Park)
25. Normandie Recreation Center
26. Arts District Park
27. Lafayette Community Center/Skate Park
28. Rockwood Community Park
29. Echo Deep Pool
30. Gilbert Lindsay Recreation Center

Library
1. Central Library
2. Pico Union Library

Source: Yahoo Maps, 2018.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 4.3
Public Services in the Project Site Vicinity

IMPACT ANALYSIS

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

(i) Fire Protection?

Less Than Significant Impact.

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[175]

LAFD has not established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response.[176] Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multilane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency

175 *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847*

176 *NFPA, NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.*

response.[177] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[178]

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

The LAFD has recently taken a number of steps to improve processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; and development of a new computer-aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.[179]

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed.[180] Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential and commercial land uses and a LAFD fire station that houses an engine or Truck Company is 1.5 miles. If this distance is exceeded, all structures would be required to install automatic fire sprinkler systems.[181] Although the Project is within the adequate response distance, the Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the two buildings.

The Project would include up to 250 dwelling units, 300 hotel guest rooms, and 13,120 square feet of ground floor commercial/retail and would generate approximately 563 new residents and 192 employees.[182] The Project would increase the utilization of the Project Site, which is currently used for office/retail buildings and would potentially increase the demand for LAFD services. The Project Site is primarily served by LAFD Station No. 10, located at 1335 S. Olive Street,

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177 LADOT, Los Angeles Signal Synchronization Fact Sheet, accessed November 2021.

178 Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

179 Los Angeles Fire Department, A Safer City Strategic Plan, accessed November 2021.

180 LAMC Section 12.21 A.17(d)2(i).

181 LAMC Section 12.21 A.17(d)2(i).

182 See Checklist Question XIV(a), Population and Housing.

approximately 0.6 miles northeast (driving distance) of the Project Site. Fire Station No. 10 provides a paramedic rescue ambulance, basic life support rescue ambulance and assessment light force, and engine. Based on correspondence with LAFD (Appendix N.3 to this SCEA), Fire Station No. 9, 15, 11, and 13 also provide service to the Project Site. Based on the response distance criteria specified in LAMC 57.09.07 A and the relatively short distance from Fire Station No. 10 to the Project Site, the LAFD concluded that fire protection response would be considered adequate. The Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that any impacts upon fire services created by the Project would be less than significant.

Emergency vehicle access to the Project Site would continue to be provided from local and major roadways (i.e. Venice Boulevard, Hope Street, Flower Street). All circulation improvements proposed would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Therefore, impacts related to emergency access would be less than significant.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. Based on correspondence with the LAFD, minimum fire flow requirement for the Project is 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) would be prepared and approved for the Project by the Department of Water and Power (LADWP) to ensure that fire flow requirements are considered adequate for the Project Site. With approval from LADWP, development of the Project would result in a less than significant impact to fire flow requirements. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site, and would result in a less than significant impact to fire protection services.

Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts to fire protection and emergency medical services from the Project would be less than significant, and no mitigation measures are required.

(ii) Police protection?

Less Than Significant Impact.

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[183]

For the purpose of this analysis, a significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is currently served by the LAPD's Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station, located at 251 E. 6th Street, approximately 2 miles northeast (driving distance) from

[183] *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847*

the Project Site. The Central Community Police Station area is approximately 4.5 square miles and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The boundaries of Central Area are as follows: 110 Freeway to the north, Washington Boulevard and 7th Street to the south, Metrolink Railroad Tracks to the east, and 110 Freeway to the west. The Central Division has approximately 398 sworn personnel and 22 civilian support staff that serves a population of 54,420 people.[184] Table 4.23, Central Area Police Station Crime Statistics, provides crime statistics for the project area as of August 3, 2019. According to the City's Computer Statistics (Compstats) report, provided for informational purposes, the average police response time to emergency calls in the Central City area during July and August 2019 was 2.8 minutes. The average response time for non-emergency calls for service in the Central City area for the same time period was 22.6 minutes. These response times are adequate performance standards for the police department.[185]

Table 4.23
Central Area Police Station Crime Statistics

Crimes	Divisional	RD 0192
Homicide	0	0
Rape	10	3
Robbery	53	4
Aggravated Assault	95	9
Burglary	27	1
Auto Theft	22	2
Burglary from Motor Vehicle	121	2
Grand Theft Person	26	0
Theft	231	4
Source: LAPD Crime Statistics for Central Area and RD 0192 as of August 3, 2019 (South Park Tower Project), James Nichols, LAPD, Community Outreach and Development Division, August 19, 2019.		

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, pursuant to the LAMC and standard conditions of approval imposed by the Department of Building and Safety when issuing project grading and construction permits, the Project would employ construction safety features including erecting temporary fencing around the construction site and securing the site to discourage trespassers and deter any potential criminal activity. Compliance with regulatory compliance measures and standard conditions would ensure impacts to police protection services during construction of the Project would be less than significant.

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[184] *Los Angeles Police Department Correspondence Letter, August 19, 2019 (See Appendix N.5 to this SCEA).*

[185] *Los Angeles Police Department Correspondence Letter, August 19, 2019 (See Appendix N.5 to this SCEA).*

Project Design Feature:

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

Operation

The development of the Project would result in an increase of on-site residents, visitors, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project guests and employees would be able to monitor suspicious activity at the building entry points. The plans for the Project would incorporate security design measures for semi-public and private spaces, which are described in Project Design Feature PDF-PS-2, below. As such, the Project's impacts to LAPD Services would be less than significant.

Project Design Feature:

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

Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. Therefore, impacts to police protection services would be less than significant, and no mitigation measures are required.

(iii) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would

exceed the capacity of the Los Angeles Unified School District (LAUSD). The determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand; (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by the following LAUSD public schools: Norwood Street Elementary School, located at 2020 Oak Street, which serves kindergarten through fifth-grade students; Adams Middle School, located at 151 W. 30th Street, which serves sixth- through eighth-grade students; Thomas Jefferson Senior High, located at 1319 E. 41st Street, which serves ninth- through twelfth-grade students; Nava College Preparatory Academy, located at 1319 E. 41st Street, which serves ninth- through twelfth-grade students; Santee Education Complex, located at 1921 S. Maple Avenue, which serves ninth- through twelfth-grade students; and Dr. Maya Angelou Community Senior High School, located at 300 E. 53rd Street, which serves ninth- through twelfth-grade students.[186] As noted in LAUSD's *Schools Enrollments and Capacities Report* provided in their March 22, 2019 correspondence (See Appendix N.1), all of the schools serving the Project Site except for Norwood Street Elementary are currently operating at or above capacity. The future projected enrollment estimates indicate all of the schools within the Project's service area will be operating at or above capacity.[187]

As shown in Table 4.24, Project Estimated Student Generation, the Project would generate approximately 67 elementary students, 18 middle school students, and 37 high school students for a total of approximately 122 students. It is likely that some of the students generated by the Project already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to the LAUSD. Based on the correspondence from the LAUDS, all of the schools currently serving the Project area are operating above capacity and are projected to have seating capacity shortages in the future school year.

[186] *See written correspondence from LAUSD to Parker Environmental Consultants, dated March 22, 2019 (See Appendix N.1, Will Serve Letters, to this SCEA).*

[187] *See written correspondence from LAUSD to Parker Environmental Consultants, dated March 22, 2019 (See Appendix N.1, Will Serve Letters, to this SCEA).*

Table 4.24
Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Project					
Multi-Family [a]	250 du	49	13	27	89
Hotel / Commercial [b]	192 emp	18	5	10	33
Total Project Student Generation:		**67**	**18**	**37**	**122**

Notes: sf = square feet; du = dwelling units; emp = employees

[a] *Student generation rates are as follows for multi-family residential uses: 0.1953 elementary, 0.0538 middle and 0.1071 high school students per unit.*

[b] *It is assumed that 0.1724 students are generated per commercial and industrial employee (Table 15 of the Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

Source: Los Angeles Unified School District, 2022 Developer Fee Justification Study, March 2022.

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other State or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA.

Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools; and impacts of the Project would be less than significant.

(iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities."

The Project Site is located within a highly urbanized area of the Central City community and, as shown in Table 4.25, Recreation and Park Facilities within the Project Area, has access to approximately 106 acres of parkland and public recreation facilities within a two-mile radius. As summarized in Table 4.25 below, these facilities range in size from a 0.05-acre pocket park to the 29.86-acre MacArthur Park. The Project would provide approximately 25,768 square feet (0.59 acres) of total common open space and amenities on-site available exclusively to serve Project residents, visitors, and hotel guests. The Project includes a variety of on-site amenities including, but not limited to, a podium terrace, amenity rooms, roof terrace, and private balconies, thereby achieving the required square feet of open space required by the LAMC, with approval of an open space reduction. In addition, the Project Applicant would be required to pay all applicable fees pursuant to the Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) or Quimby Fees, which would be used to provide additional park facilities in the Project area.

With payment of the mandatory developer fees, the Project's increased demands upon public parkland and recreation facilities would be less than significant.

Table 4.25
Recreation and Park Facilities within the Project Area

Park Name	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Venice Hope Park	0.50	Open space, benches	0.01
2. Toberman Recreation Center	2.70	Auditorium, barbecue pits, baseball diamond (lighted), children's play area, community room, indoor gym, picnic tables	0.61
3. Orthopeadic Hospital Playground	0.33	Children's playground	0.66
4. Saint James Park	0.94	Children's play area, open space	0.74
5. Grand Hope Park	2.07	Clock tower, open space (lawns), and children's play area	0.80
6. Hoover Recreation Center	2.46	Basketball courts, children's play area, picnic tables, indoor gym, barbecue pits, kitchen, gym	0.86
7. Alvarado Terrace Park	0.91	Children's play area and gazebo	0.93
8. Trinity Recreation Center	2.06	Auditorium, basketball courts (lighted/outdoor), open space, children's play area.	0.94
9. Pico Union Park	0.75	Children's play area, picnic tables	0.95
10. Hope and Peace Park	0.57	Basketball courts and benches	1.21
11. Pershing Square Park	4.44	Ice skating rink (seasonal), stage, sunken amphitheater	1.25
12. Spring Street Park	0.56	Open space, benches, children's play area	1.38
13. San Julian Park	0.30	Open space, benches, picnic tables	1.43
14. Central Park Recreational Center and Pool	0.70	Basketball courts (lighted/indoor), children's play area, pool	1.50
15. 6th & Gladys Street Park	0.34	Open space and basketball court	1.52
16. Richardson Family Park	0.32	Basketball courts, children's play area, picnic tables	1.61
17. Exposition Park	10.30	Rose garden, benches	1.66
18. Jesse Brewer Jr. Park	1.60	Children's play area, benches, picnic tables, open space	1.70
19. Mac Arthur Park	29.75	Baseball diamond, children's play area, picnic tables, lake, year-round indoor pool	1.71
20. City Hall Park Center	1.58	Open space and basketball court	1.82
21. Grand Park	12.0	Open space, benches, and dog park	1.82
22. West Adams Heights Park	0.08	Open space, benches, children's play area	1.83
23. Vista Hermosa Park	2.13	Children's play area, picnic tables, soccer field	1.85
24. Unidad Park (Beverly Park)	0.33	Children's play area, benches	1.88
25. Normandie Recreation Center	3.28	Baseball diamond, basketball courts, children's play Area, community room	1.89
26. Arts District Park	0.05	Children's play area, picnic tables	1.94
27. Lafayette Community Center and Skate Park	9.80	Children's play area, picnic tables, basketball courts, tennis courts, community room, soccer field, kitchen, stage, TV area, skate park	1.94
28. Rockwood Community Park	0.07	Open space, benches, children's play area	1.95
29. Echo Deep Pool	1.04	Year-round pool (indoor/heated)	1.99
30. Gilbert Lindsay Recreation Center and Skate Park	14.70	Skate park, auditorium, basketball courts (lighted/indoor), children's play area, indoor gym (without weights), kitchen, outdoor fitness equipment, preschool	2.00
Total Parkland (Approximate)	**106.66**		

Sources: Park distances, size, and amenities were determined using:
(1) City of Los Angeles Department of Recreation and Parks, Facility Locator, and
(2) Navigate LA, accessed November 2021.

(v) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Central Library (538,000 square feet), located at 630 W. 5th Street, approximately 1.4 miles north of the Project Site;
- Little Tokyo Branch Library (12,500 square feet), located at 203 S. Los Angeles Street, approximately 1.6 miles northeast of the Project Site; and
- Pico Union Branch (12,500 square feet), located at 1030 S. Alvarado Street, approximately 1.5 miles northwest of the Project Site.[188]

LAPL Criteria for New Libraries (formerly Site Selection Guidelines) recommended sizes for libraries are 12,500 sf facilities for communities with less than a population of 45,000 and 14,500 sf facilities for communities with a population of more than 45,000. At 538,000 sf the Central Library far exceeds these criteria and currently meets the library demands of the surrounding community. Therefore, it would be able to meet the Project's demand for library services, and the Project's impacts upon library services would be less than significant.

The Project would generate approximately 563 residents and an increase of roughly 192 employees. Employees of commercial development do not typically frequent libraries during work hours, but are more likely to use libraries near their homes during non-work hours. The additional 563 residents represent a negligible amount of the current service population of the Little Tokyo Branch Library and Pico Union Branch Library and would be accommodated in the future service population of the Central Library, which serves the entire City. Based on correspondence with the LAPL, the LAPL has indicated that there are no current plans to build new libraries that would

[188] *City of Los Angeles Public Library, Aurial Granger, Management Assistant, Facilities & Event Management, South Park Towers Project Request for Information, Los Angeles Public Library Response, March 1, 2019 (see Appendix N.2 to this SCEA).*

serve the Project area. **Therefore, potential impacts to library service and facilities will be less than significant.**

Cumulative Impacts

(i) Fire protection

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing land uses in an already highly urbanized area of Los Angeles and could increase the demand for fire protection services in the vicinity of the projects. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and the related projects would contribute. Each project would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. Consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833, ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. **However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts on fire protection would be less than significant.**

(ii) Police protection

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing land uses in an already heavily urbanized area of Los Angeles and could increase the demand for police protection services in the vicinity of the projects. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and the related projects would contribute. In addition, each project would be individually subject to Site Plan review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each related project would likely be required install and/or incorporate adequate

crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services.

To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for the development of new police stations in the vicinity of the Project Site, no impacts with respect to construction of new stations are currently anticipated to occur.

Additionally, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document. **On this basis, the Project would not make a cumulatively considerable contribution to demand for police protection services, and cumulative impacts on police protection would be less than significant.**

(iii) Schools

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. The Project in conjunction with the related projects is expected to result in a cumulative increase in the demand for school services. As noted in the LAUSD's correspondence provided in Appendix N.1, Will Serve Letters, the schools serving the Project Site are impacted and are projected to be operating at or above capacity by the Project's buildout year.

As shown in Table 4.26, Estimated Cumulative Student Generation, Project and the related projects would cumulatively contribute approximately 350 elementary school students, 9 middle school students, and 193 high school students, for a total of 639 students. This would create an increased cumulative demand on the local school districts. **However, like the Project, each related project would be required to pay school developer fees, pursuant to California**

Education Code Section 17620(a)(1), which would mitigate any cumulative impacts. As such, cumulative impacts on schools would be less than significant.

Table 4.26
Estimated Cumulative Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Residential [a]	1,144 du	223	62	123	408
Commercial Uses	633 emp [b]	60	16	33	109
Related Projects Total:		***283***	***78***	***156***	***517***
Project Net Total:		67	18	37	122
Cumulative Total:		**350**	**96**	**193**	**639**

Notes: du = dwelling units; emp = employees
[a] *Student generation rates are as follows for multi-family residential uses: 0.1953 elementary, 0.0538 middle and 0.1071 high school students per unit.*
[b] *The employee generation factor for commercial uses were taken from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*
[c] *It is assumed that 0.1724 students are generated per commercial and industrial employee (Table 15 of the Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*
Source: Los Angeles Unified School District, 2022 Developer Fee Justification Study, March 2022.

(iv) Parks

Less Than Significant Impact. Development of the Project in conjunction with the related projects that include residential uses could result in an increase in permanent residents residing in the vicinity of the projects. In the absence of mitigation, additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the long-term goal standards. However, like the Project, each related project with residential uses would comply with payment of Quimby or other fees, such as the Dwelling Unit Construction Tax (for apartment units). Each related project with residential uses would also be required to comply with the on-site open space requirements of the LAMC. **Therefore, with payment of the applicable recreation fees on a project-by-project basis, cumulative impacts would be less-than-significant.**

(v) Other Public Facilities

Less Than Significant Impact. Development of the related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population, would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's

Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[189] Moreover, the Central Library far exceeds the LAPL criteria for its service area. **Thus, the additional population generated by the Project and the related projects would not make a cumulatively considerable impact upon the City's library system.**

XVI. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

IMPACT ANALYSIS

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services

[189] *Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*

anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Project will generate 563 residents and will provide a minimum of 25,768 square feet of open space areas, including private open space on balconies and common open space areas within a rooftop pool deck, upper level terraces, and paseo. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. As noted in Table 4.25, above, there are 30 existing new and recently improved parks within the Project Area totaling approximately 106 acres that are available to serve the future residents, hotel guests, and retail visitors to the Project Site. Notable new additions to the downtown area are Grand Park, at the Los Angeles Civic Center, and Spring Street Park, a pocket park recently developed at 426 S. Spring Street. In addition, the Project would provide approximately 25,768 square feet (0.59 acres) of open space and recreational facilities on-site that would be available exclusively to serve Project residents and their guests including, but not limited to, a podium terrace, amenity rooms, roof terrace, private balconies. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. In addition, the Project Applicant would be required to pay fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505) or Quimby Fees, if applicable, which would be used to provide additional park facilities in the Project area. Therefore, the Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. **Accordingly, the Project's impact upon parks and recreational facilities would be less than significant.**

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, there are 30 existing, new, or recently improved parks within the Project Area totaling approximately 106 acres that are available to serve the future residents, hotel guests, and retail visitors to the Project Site. The Project would also provide approximately 25,768 square feet of open space and recreational facilities on-site. Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that

such goals will be met by "seek[ing] federal, state and private funds to implement acquisition and development of parks and recreational facilities." The Project's increased demands upon recreational facilities would not in and of itself require or result in the construction of a new park because of the relatively small population increase generated by the Project, the incorporation of on-site amenities which would off-set the Project's demands for park facilities, and the availability of 106 acres of parkland within the Project service area. **Thus, impacts to park and recreational facilities would be less than significant.**

Cumulative Impacts

Less Than Significant Impact. The Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. A number of new parks and recently renovated park improvements have been made in the downtown area to accommodate cumulative demands created by increased residential development. Similar to the Project's requirement to pay fees to improve recreation and park facilities, the related projects that include residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. **Because the Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Project's impacts would not be cumulatively considerable.**

XVII. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☒	☐	☐
c. Substantially increase hazards 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?	☐	☐	☒	☐

The following section summarizes and incorporates by reference the information provided in the South Park Towers Project, VMT Analysis, prepared by The Mobility Group, dated December 9, 2019. The VMT Analysis and the City of Los Angeles Department of Transportation (LADOT) correspondence of approval, signed January 6, 2020, for the updated Transportation Impact Analysis, are provided in Appendix F.1. It should be noted that on July 10, 2019, LADOT issued a traffic assessment report to the Department of City Planning on the proposed South Park Towers Mixed-Use Project (ENV-2018-3337-EAF/VTT-82213). On July 30, 2019, pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State's California Environmental Quality Act (CEQA) Guidelines, the City of Los Angeles adopted vehicle miles traveled (VMT) as the criteria by which to determine transportation impacts under CEQA. Therefore, in response to this action the Applicant submitted a VMT analysis for the Project in addition to the previous analysis submitted in April 2019. The VMT analysis update addresses the current CEQA threshold questions pursuant to CEQA Guidelines section 15064.3 subdivision (b) and SB 375. Furthermore, LADOT provided an updated correspondence of approval, dated January 6, 2020 in response to the VMT Analysis, as provided in Appendix F.1. Accordingly, the previously approved April 2019 Traffic Assessment Report has been moved to Appendix F.2 as a non-CEQA transportation analysis for informational purposes under the City of Los Angeles' Site Plan Review authority as established in Section 16.05 of the LAMC. The Mitigation Measures identified in LADOT's January 6, 2020 assessment letter have been incorporated into the Project as Mitigation Measures MM T-1 through MM T-3, below.

Mitigation Measures

MM T-1: Transportation Demand Management (TDM) Promotions and Marketing

The Project shall provide all eligible employees and residents with marketing and promotional materials to educate and inform travelers about site-specific transportation options and effects of their travel choices.

MM T-2: Shared Mobility

The Project shall provide on-demand access to shared mobility options as an incentive to consider other transportation travel modes. The Project shall provide five car-share spaces, ten bike-share spaces, and a rideshare program.

MM T-3: Unbundle Parking

The Project shall provide unbundled parking, which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. The analysis estimated that a parking space would cost at least $220 per month for residents to lease. The Applicant shall unbundle parking costs from residential lease payments and charge at least $220 per month per parking space for residents who park on site.

IMPACT ANALYSIS

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. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. In accordance with the City's Transportation Assessment Guidelines (TAG), a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent. Table 4.27, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the project conflicts with the City's circulation system policies. As indicated in Table 4.27, with incorporation of the Mitigation Measures referenced above, the Project is in conformance with the applicable policies and programs corresponding to the Project and would not preclude the City's implementation of any adopted policy and/or program. Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

Table 4.27
Questions to Determine Project Applicability to Plans, Policies and Programs

#	Guiding Questions	Response
	Existing Plan Applicability	
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? (screening question)	**No Conflict.** Per the Mobility Element 2035 Flower Street is a Modified Avenue I and requires a 37.5-foot half-width roadway within a 52.5-foot half-width right-of-way. Venice Boulevard is a Modified Avenue II and requires a 29.5-foot half-width roadway within a 40.5-foot half-width right-of-way east of Pembroke Lane and 33-foot half-width roadway within a 45-foot half-width right-of-way west of Pembroke Lane. Hope Street is a Collector Street south of Venice Boulevard and requires a 20-foot half-width roadway within a 33-foot half-width right-of-way. No roadway widening or dedications are required to accommodate the Mobility Plan's roadway requirements for Hope Street or Flower Street. To meet the Mobility Plan's roadway requirements for Venice Street, the Project would widen Venice Boulevard by 13 feet and dedicate 15 feet. Thus, the Project would be consistent with the Mobility Plan 2035 street designations.
2	Is the Project Site along any network identified in the City's Mobility Plan?	**No Conflict.** Venice Boulevard is identified as a Comprehensive Transit Enhanced street in the Transit Enhanced Network map and a Tier 2 Bicycle Lane on the

#	Guiding Questions	Response
		Bicycle Lane Network Map in the Mobility Plan 2035. At the time of preparing this report, a Tier 2 bike lane on Venice Boulevard has not been programmed for completion before the Project design year of 2025 so there are no definitive details on roadway layouts to accommodate the improvements, and so they are not included in the project analysis. Hope Street, Venice Boulevard, and Flower Street are identified as Pedestrian Segments in the Pedestrian Enhanced Districts Map of the Mobility Plan 2035. The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. On the west half of the Project Site, there is currently a 10-foot sidewalk on Venice Boulevard adjacent to the Project site, and on the east half of the Project Site, there is a 15-foot sidewalk on Venice Boulevard. There is currently a 13-foot sidewalk on Flower Street adjacent to and west of the Project site, and a twelve-foot sidewalk on Hope Street adjacent to and east of the Project Site. The Project is not located in the High Injury Network (HIN). As such the Project would not conflict with any of the network programs or policies of the Mobility Plan 2035.
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	**No Conflict.** As noted above, no roadway widening or dedications are required to accommodate the Mobility Plan's roadway requirements for Hope Street or Flower Street. However, the Project would widen Venice Boulevard by 13 feet and dedicate 15 feet to accommodate the required roadway dimensions for Venice Street. These off-site improvements would be implemented in coordination with LADOT and thus would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
4	Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	**No Conflict.** The Project does not require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program. As such, no conflict would occur.
5	Is the Project Site in an Identified Transit Oriented Community?	**No Conflict.** The Project is located in a Tier 3 Transit Oriented Community. As discussed in Section 2, Project Description, the Project Site is designated as a "Transit Priority Area" per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. The Project is consistent with SCAG's Connect SoCal policies to develop high density housing in

#	Guiding Questions	Response
		proximity to high quality transit areas and employment centers. As such, the Project would not conflict with policies associated with TOC areas.
6	Is the Project Site on a roadway identified in the City's High Injury Network?	**No Conflict.** The Project Site is not identified in the City's High Injury Network. As such, no conflict would occur.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	**No Conflict**. The project proposes to provide a passenger loading zone along the project frontage on Venice Boulevard and a driveway on Hope Street. The passenger loading zone would provide a safe place for vehicle drop-off/pick-up without blocking traffic. These improvements would be implemented in coordination with LADOT and thus would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
8	Does the Project propose narrowing or shifting existing sidewalk placement?	**No Conflict**. See responses to questions 2 and 7 above.
9	Does the Project propose paving, narrowing, shifting or removing an existing parkway?	**No Conflict**. The Project does not proposed modification of an existing parkway.
10	Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	**No Conflict**. The Project will not modify, remove, or otherwise affect existing bicycle infrastructure.
11	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	**No Conflict**. The Project Site is adjacent to an alleyway which borders the Project Site to the south. This alley only provides access to the Project Site. The Project does not propose to modify or restrict alley access. As such, no conflict would occur.
12	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	**No Conflict**. The Project Site is not located adjacent to a cul-de-sac, nor would the Project create a cul-de-sac. As such there would be no conflict with the Mobility Plan 2035.
Access: Driveways and Loading		
13	Does the Project Site introduce a new driveway or loading access	**No Conflict**. The project proposes to provide a passenger loading zone along the project frontage on Venice Boulevard and a driveway on Hope Street. Venice Boulevard is a Modified Avenue II and Hope Street is a

#	Guiding Questions	Response
	along an arterial (Avenue or Boulevard)?	Collector Street south of Venice Boulevard. These improvements would be implemented in coordination with LADOT and thus would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
14	If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	Project Site access would be provided via a Hope Street driveway (non-arterial frontage) adjacent to the alley that borders the site to the south. Loading areas are also located off this driveway. Access to the loading areas would also be accommodated via the alley access from Flower Street. Thus, non-arterial frontage or alley access is available to serve the driveway or loading access needs. Driveway and access improvements would be coordinated with LADOT and would not conflict with long-term mobility needs identified in the Mobility Plan 2035.
15	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	**No Conflict**. The Project Site is bound by Venice Boulevard, Flower and Hope Streets. Project Site access and driveway design would be designed and developed in consultation with the LADOT, LADBS, and the LAFD, and would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
16	Does the Project propose driveway width in excess of City standard?	**No Conflict**. Per LADOT's Manual of Policies and Procedures, Section 321, it is recommended that two-way driveways serving multi-family residential projects with more than 25 parking spaces are 30 feet in width. The Project's driveway width is 30 feet wide and would thus be in conformance with City standards.
17	Does the Project propose more driveways than required by City maximum standard?	**No Conflict**. The Project proposes one two-way driveway along Hope Street which is compliant with LADOT's Manual of Policies and Procedures, Section 321.
18	Are loading zones proposed as part of the Project?	**No Conflict**. The Project incorporates two on-site loading zones on the south side of the Project Site. Both loading zones would be accessible via Hope Street and are adjacent to the abutting alleyway. As such, the project would not be in conflict with City policies that recommend loading be located away from arterial streets.
19	Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	**No Conflict**. The Project includes a passenger drop-off area in front of the building on Pico Boulevard and a roundabout valet drop off zone on the south side of the Project between the hotel and residential towers. The Project's driveway and access improvements would be coordinated with LADOT and would not conflict with long-term mobility needs identified in the Mobility Plan 2035.
20	Does the Project propose modifying, limiting/restricting, or	**No Conflict.** The Project does not propose to modify, limit or remove public access to public right-of-way.

#	Guiding Questions	Response
	removing public access to a public right-of-way (e.g., vacating public right-of-way)?	

Construction Traffic

The Project would require the use of haul trucks during demolition, site clearing, excavation, and the use of a variety of other construction vehicles throughout the construction of the Project.

Construction hours are permitted by Mitigation Measure N-1 to be from 7:00 AM to 6:00 PM weekdays and 8:00 AM to 6:00 PM Saturdays, though the majority of work will occur between 7:00 AM and 3:30 PM. Additional shifts may operate during the building construction, and finishing and architectural coating phases, but would operate outside the AM and PM peak hours. No construction would occur on Sundays.

Construction Worker and Vendor Trips

The construction phases are expected to be largely sequential in duration. The following analysis is based on total construction activity at the Project Site. The demolition and site clearing phase would occur for approximately one month with up to 20 truckloads per day, and up to 5 employees on site. The grading/excavation phase would occur for approximately one month with up to 40 truckloads per day, and up to 12 employees on site. The building foundations phase would occur for approximately two months with a maximum of approximately 350 truckloads per day, and up to 60 employees on-site. This truckload maximum would not occur throughout the two-month period and the average would be lower. The building construction phase would occur for approximately 14 months and is expected to generate up to 75 truckloads per day to the Project Site, with up to 200 employees on-site. The finishing and architectural coatings phase would occur for approximately twelve months with up to 10 truckloads per day and up to 120 daily workers on-site. The paving and landscaping phase would occur for approximately four months, with up to 10 truckloads per day and up to 35 daily workers on-site.

It is anticipated that the construction haul route would utilize the I-10 San Bernardino Freeway immediately to the south of the Project Site and would minimize the use of surface streets. From the Project Site, the proposed haul route would travel via Venice Boulevard to Grand Avenue then south to 17th Street and use the Grand Avenue westbound on-ramp to I-10 westbound and then I-110 northbound. To the Project Site, the haul route would travel from the southbound I-110 and eastbound I-10 Freeway, use the Grand Avenue/18th Street off-ramp and proceed on 18th Street, and use Olive Street and 17th Street to the Project Site. This haul route may be modified in compliance with City policies, provided LADOT and/or the Department of Street Services approves any such modification.

Construction Truck Traffic

The typical peak volume of truck trips would occur during the 14 months of the Project's building construction phase. During this period, there would be up to 75 daily trucks between 7:00 AM and 3:30 PM (total of 150 two-way trips). The Transportation Research Board (HCM2010 Highway Capacity Manual) identifies a passenger car equivalent (PCE) factor of 2.0 for trucks (as trucks are larger and less maneuverable than passenger cars), so 150 daily truck trips is the equivalent of 300 passenger car trips per day and 36 trips per hour. This volume of trips would represent an average of 4 percent of existing peak hour traffic volumes on Venice Boulevard and Hope Street/17th Street, the main routes to/from the Project Site. The 36 truck trips per hour would also represent only 21 percent of the 168 total AM peak hour trips estimated for the Project when in operation. As discussed above, there would be no significant impacts in the AM peak hour for Existing With Project conditions.

The highest level of truck activity would occur during the two months of the concrete pour for the building foundations phase, with a total of 350 trucks and up to a maximum of 44 daily truckloads. A daily total of 44 trucks would represent 88 truck trips and 176 equivalent car trips, with an average of 16 trips per hour over an eleven-hour period. As this would be a temporary condition, impacts would be less than significant.

Truck activity at the Project Site would be carefully managed, including the use of flagmen, and off-site staging could occur where feasible. The activity would be closely coordinated with LADOT and neighboring land uses, to minimize any impacts to the maximum extent feasible.

During other phases of construction, there would typically be far fewer truck loads/trips. The construction truck traffic would be a temporary condition, and would generate less trips than the Project's operation in the Existing With Project condition, and would comprise a small proportion of existing traffic on Venice Boulevard and Hope Street. With implementation of a Construction Traffic Management Plan, construction truck traffic would be less than significant.

Construction Worker Traffic and Parking

The number of construction workers working on-site at one time would vary throughout the construction process in order to maintain an effective schedule of completion. It is estimated that during the construction period the number of workers that would be on-site at any given time would typically range from less than 60 to a peak of 200 workers. For a 26-month period, there would be an average of approximately 160 workers.

Construction workers would generally be on-site before 7:00 AM, and typically would leave the Project Site before 3:30 PM, so that the workers would therefore travel before the morning and evening peak commute hours. Up to 10 percent of workers could leave after 3:30 PM. Not all workers would drive, as some workers would be expected to take transit and to rideshare. Based on the typical peak of 160 workers and assuming 15 percent of workers would take transit or

rideshare (consistent with trip generation analysis for the Project's operation, above), approximately 14 worker trips could occur in the PM peak hour (if all the remaining workers at the site left in the same hour). This volume of trips would represent only 1 percent of existing peak hour traffic volumes on Venice Boulevard adjacent to the Project Site.

During other construction periods, the number of workers would be far less, with less than 60 workers per day. It is therefore expected that the number of construction worker trips would have a less than significant traffic impact.

Parking for construction workers would be provided at off-site locations within convenient walking distance to the Project Site or by shuttle from parking sites further from the Project Site. Construction worker parking would not be permitted along any streets. Therefore, the Project would have a less than significant impact from construction parking.

Roadway Lane and Sidewalk Closures

It is expected that construction activities would not necessitate the regular closure of any traffic or parking lanes on Venice Boulevard or Flower Street. Construction is expected to temporarily remove the existing parking lane on Hope Street adjacent to the Project Site (7 spaces). Therefore, there would be no impacts to traffic circulation due to long term closure of traffic lanes. During off peak periods, it may be necessary to temporarily close the eastbound curb lane on Venice Boulevard for deliveries. This would be an infrequent and temporary condition and in conjunction with the provisions for the Construction Traffic Management Program, which is required as a condition of approval by the LADOT (See Non-CEQA Transportation Analysis in Appendix F.1). With implementation of a Construction Traffic Management Program, impacts from roadway closures would be less than significant.

The sidewalk on the south side of Venice Boulevard adjacent to the Project Site would be closed during the construction period. A convenient alternate route would be available via the sidewalk on the north side of Venice Boulevard and signalized pedestrian crosswalks at Venice Boulevard/Flower Street and Venice Boulevard/Hope Street. This route would be signed as part of the Construction Traffic Management Plan. Therefore, impacts due to sidewalk closures would be less than significant.

Additionally, as part of the Construction Traffic Management Plan, the Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The Applicant shall obtain school walk and bus routes to the schools from the administrators and guarantee that safe and convenient pedestrian and bus routes to the school be maintained. The Applicant shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school.

On-street parking is currently not allowed on Flower Street adjacent to the Project Site. There are seven (7) on-street parking spaces on Hope Street adjacent to the Project that are available any time and seven (7) on-street spaces on Venice Boulevard that are available before 7:00 AM and after 6:00 PM. These would remain during construction. There would be a temporary loss of seven parking spaces on Hope Street during the 32-month construction period. Because this loss would be of a temporary nature, construction impacts on parking would be less than significant.

Project construction would not close, or block access to any properties in the vicinity of the Project Site. Therefore, impacts on vehicle access would be less than significant. Furthermore, there are no bus stops adjacent to the Project Site. Therefore, construction impacts to bus routes would be less than significant.

As discussed above, implementation of the Construction Traffic Control Plan and the Worksite Traffic Control Plan would reduce any construction impacts to less than significant levels.

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

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On July 30, 2019, the City of Los Angeles adopted LADOT's CEQA Transportation Assessment Guidelines (TAG), which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts in conformance with SB 743. The adopted TAG establishes VMT as the City's formal method of evaluating a project's transportation impacts. As part of the preparation of this version of the City's TAG, the City updated its travel demand simulation model and transportation impact thresholds to be consistent with the VMT impact methodology.

VMT Screening

The preparation of a transportation assessment, which includes a VMT analysis, is required for a project that would generate a net increase of 250 or more daily vehicle trips. Table 4.28, below, shows the VMT trip generation screening comparison of the existing daily trips and proposed daily trips to determine if a VMT analysis is required. The VMT screening indicates a VMT analysis is not necessary because the Project does not add more than 250 daily trips. Because the net trips are only two trips below the threshold of 250 trips, a VMT analysis was conducted to determine the VMT impacts for the Project alone, without credits for the existing uses (see Appendix F.1 for VMT calculations).

Table 4.28
VMT Trip Generation – Project Screening Comparison

	Land Use	Scale	Daily Trips
Proposed	Multi-Family	250 du	
	Hotel	300 rooms	
	Medical Office [a]	10,000 sf	
	High Turnover Restaurant [b]	3,120 sf	
	Subtotal		**2,840**
Existing	Retail	87,731 sf	
	Office	1,779 sf	
	Subtotal		**2,592**
	Net Difference [Proposed – Existing]		248
	Analysis Required [Net Difference > 250]		No [c]

Notes:
du = Dwelling Units; sf = square feet; rms = guest rooms
[a] *The ground floor commercial area within the Mixed-Use Residential Building may be used as retail, office, or medical office uses. For purposes of providing flexibility in leasing options, this space was analyzed as medical office space.*
[b] *The ground floor commercial area within the Hotel Building may be used as retail, or restaurant uses. For purposes of providing flexibility in leasing options, this area was analyzed as restaurant space.*
[c] *Additional daily trips are very close to threshold so the VMT analysis conducted for conservative purposes.*
Source: The Mobility Group, South Park Towers (1600 S. Flower Street) – VMT Analysis, December 9, 2019.

VMT Thresholds

LADOT has identified thresholds for significant VMT impacts by sub-area of the City, by Area Planning Commission (APC) area. The State of California Office of Planning and Research (OPR) has found that a VMT per capita or per employee that is 15% or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA. CEQA allows lead agencies to set or apply their own significance thresholds. LADOT set its significance thresholds as follows: a residential project would result in a significant VMT impact if it would generate household VMT per capita more than 15% below the existing average household VMT per capita for the APC area in which it is located. Similarly, an office project would result in a significant VMT impact if it would generate work VMT per employee more than 15% below the existing average work VMT per employee for the APC area in which it's located. (LADOT Guidelines, page 17.)

The Project is located in the Central APC. For this area of the City the following specific thresholds have been identified:

- Household VMT Per Capita: 6.0

- VMT Per Employee: 7.6

VMT Analysis

As shown in Table 4.29, below, with the Project, the Household VMT per Capita would be 6.2 compared to the threshold of 6.0, and the Work VMT per Capita would be 7.8 compared to the threshold of 7.6. Therefore, it is concluded that the Project would cause significant VMT impacts for both Household VMT and Work VMT prior to mitigation. The LADOT VMT calculation worksheets are provided in Appendix F.1 to this SCEA.

Mitigation measures were added to the calculator, which would reduce the Household VMT per Capita to 4.7 compared to the threshold of 6.0, and the Work VMT per Capita to 7.2 compared to the threshold of 7.6. The VMT Calculator provides for inputs relating to trip reduction measures (TDM strategies), either as project design features or as project mitigations. The following measures were included as Mitigation Measures:

- Trip Reduction Promotion & Marketing
- Car Share
- Bike Share
- LAMC Bicycle Parking
- Secure Bike Parking & Showers
- Pedestrian Network Improvements (On-Site)

The TDM Strategies are incorporated into the Project as noted under MM-T-1 through T-3, above. These mitigation measures were incorporated into the VMT calculator inputs to further reduce the Project's VMT impacts to below significance. Therefore, it is concluded that the Project with mitigation would not cause significant VMT impacts for either Household VMT and Work VMT. **Therefore, VMT impacts would be less than significant with mitigation incorporated.**

Table 4.29
VMT Analysis

Category	*Household*			*Work* [a]		
Scenario	*Household VMT Threshold*	*Household VMT Per Capita*	*Impact*	*Work VMT Threshold*	*Work VMT per Employee*	*Impact*
Project Without Mitigation	6.0	3.2	Yes	7.6	7.8	Yes
Project With Mitigation	6.0	4.7	No	7.6	7.2	No

[a] VMT calculations excludes 3,120 sf of restaurant space as local serving retail, per LADOT Guidelines.

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. A significant impact may occur if the Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if Project Site access or other features were designed in such a way as to create hazard conditions.

Vehicular access to the Project Site is currently provided by two ingress/egress driveways: one along Flower Street and one along Hope Street. Vehicular access is also provided to the on-site private driveway that bisects the Project Site.

Vehicle access to the Project Site would be provided by a single driveway on Hope Street at the southern edge of the property. This would accommodate all vehicles including trucks. Trucks would access the truck loading docks on-site. Access from Flower Street to the west end of the Project Site would be allowed via the existing alley only for trucks to service the electrical supply and trash pick-up. The Project intends to seek a revocable permit to close the unnamed alley for public use (as its only current purpose is to serve the Project Site). These trucks would then exit at Hope Street. Otherwise, there would be no vehicular access to the Project Site from Flower Street via the alley. Cars would access either of the on-site parking garages as well as the on-site porte-cochere.

There is currently an unnamed alley at the south edge of the property that extends from Flower Street to the mid-point of the Project Site, but does not connect to either Hope Street or to Venice Boulevard. Access to the alley is from Flower Street and requires crossing the Metro rail tracks on the east side of Flower Street (a dedicated southbound left turn currently exists to accommodate this movement). The alley is immediately adjacent to a Caltrans property that extends under the I-10 Freeway, and that is also accessed from Flower Street. The Project would not cause any changes to the access to the Caltrans property which would remain as is. The Project intends to seek a revocable permit to close the unnamed alley for public use (as its only current purpose is to serve the Project Site). This would provide the room necessary on-site to enable trucks to access the Project's trash pick-up and electrical vault (at the west end of the Project Site) from Hope Street - such that no Project traffic would access from Flower Street and cross the Metro tracks. The number of vehicles crossing the Metro tracks to access the site would therefore be zero, or very minimal. A pull-out area is proposed on Venice Boulevard mid-block to provide a passenger loading zone (drop-offs and picks-ups) for the hotel. This would provide a safe place for drop-offs and picks-ups to occur without blocking traffic lanes on Venice Boulevard. The Project would not include unusual or hazardous design features.

Additionally, the Project would comply with the requirements of the Mobility Plan 2035. It would widen Venice Boulevard by 13 feet to provide the required 45 feet half roadway width, and would dedicate 15 feet to provide the required half-right-of-way width. The Project would also provide the required 3-foot easement. The widened street would allow for two eastbound traffic lanes (as today) as well as the addition of on-street parking adjacent to the Project Site.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed in the area surrounding the Project Site. As such, the Project would not include new vehicular access driveways that could potentially conflict with pedestrian circulation and traffic. Therefore, the Project would not substantially increase hazards due to design features or incompatible uses, and no impact would occur.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact A significant impact may occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

The Project is not located on or near an adopted emergency response or evacuation plan. It is expected that construction activities would not necessitate the regular closure of any traffic or parking lanes on Venice Boulevard or Flower Street. Development of the Project Site may require temporary partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, the impacts would be less than significant.

As described in Checklist Question IX(f), the Project would satisfy the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Project would be reviewed and approved by LADOT. Furthermore, the Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Project would not be expected to result in inadequate emergency access, and the impact would be less than significant.

Cumulative impacts

Less Than Significant with Mitigation Incorporated. Development of the Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the Central City Community Plan Area. In accordance with the City's Traffic Assessment Guidelines, cumulative VMT impacts are determined through a consistency check with SCAG's Connect SoCal. The Connect SoCal plan is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas emissions reduction targets. As such, projects that are consistent with Connect SoCal in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. As noted in Table 1 in Appendix P, the Project is consistent with the Connect SoCal plan. Thus, the Project's cumulative VMT impacts would be considered less than significant. Furthermore, as noted in Table 4.29, above, the VMT increase from the Project would result in a less than significant impact with the implementation of mitigation measures. As such, the Project's contribution to 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 (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

IMPACT ANALYSIS

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Responses to a and b: Less Than Significant Impact. For purposes of this analysis, Dudek was retained to prepare a Tribal Cultural Resources Report to assess the potential for significance of the Project to impact resources associated with California Native American tribes. The following section is based on the following technical report:

- Dudek, Tribal Cultural Resources Report for The South Park Towers Project, City of Los Angeles, Los Angeles County, California, November 2018.

The Project Site is currently developed with four commercial buildings which would be demolished to accommodate the project. The project site is located within a highly urbanized area, and is immediately north of Interstate-10. Surrounding uses in the vicinity of the project site include commercial uses to the north, east, and west.

The Project Site is situated in the valley representing Downtown Los Angeles, approximately 13 miles northeast of the Pacific Ocean. The channelized Los Angeles River is 2.4 miles to the east. Existing development is underlain by Quaternary alluvium and marine deposits, generally dating between the Pliocene and the Holocene. Soils are dominated by the Urban land, commercial, complex, associated with low-slope alluvial conditions (USDA 2018). Due the size and nature of past development associated with the surroundings structures and existing paved area native subsurface soils with potential to support the presence of cultural deposits have likely been disturbed. However, there is always some possibility that subsurface Native American resources could be present, as have been encountered elsewhere in the City. Historic-age refuse deposits generally post-dating the primary period of Native American use of this area have also been identified throughout downtown Los Angeles.

As mentioned previously in Checklist Question V(b), Cultural Resources, a total of 16 previously recorded cultural resources have been documented within a half-mile of the Project. None of these intersect the Project Site. All of the 16 resources identified during the records search are historic-era buildings. No cultural resources of Native American origin are documented within the Project Site or surrounding half-mile search area of files held at the SCCIC.

As part of the process of identifying cultural resources within or near the Project Site, Dudek contacted the NAHC to request a review of the Sacred Lands File (SLF) on October 10, 2018. The NAHC emailed a response on October 16, 2018, which indicated that the SLF search was completed with negative results. Because the SLF search does not include an exhaustive list of Native American cultural resources, the NAHC suggested contacting Native American individuals and/or tribal organizations who may have direct knowledge of cultural resources in or near the Project Site. The NAHC provided the contact information of ten individuals and/or entities with whom to contact along with the SLF search results. Documents related to the NAHC SLF search are included in Appendix J to this SCEA.

Pre-consultation request letters were sent on January 28, 2018 to the local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects. On February 1, 2018, the Gabrieleño Band of Mission Indians - Kizh Nation contacted the City requesting consultation. Consultation was initiated by the City with the Gabrieleño Band of Mission Indians - Kizh Nation on March 21, 2018. During consultation, the Gabrieleño Band of Mission Indians - Kizh Nation requested information regarding equipment type and construction activities. On August 13, 2018, the City followed up via email with details related to the number/type of equipment and anticipated nature of earth-disturbing work. The City included a request for a response by August 27, 2018, to which no response has been received to date. As there has been no further correspondence from the Gabrieleño Band of Mission Indians - Kizh Nation the City has closed consultation. To date, no responses have been received from other tribal contacts regarding tribal cultural resources or other concerns about the Project.

Therefore, because the Project Site has been subject to ground disturbance activities in the past and is not known to be associated with any cultural or sacred sites, and no Native American Tribal Representatives have requested further consultation, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Thus, in the absence of any known cultural resources, no mitigation measures are required Nonetheless, the Project Applicant would be required to implement the City's Condition of Approval related to the inadvertent discovery of Tribal Cultural Resources and adherence to the regulatory compliance measures referenced above in Checklist Question V(b), Cultural Resources, would ensure impacts associated with the accidental discovery of any tribal cultural resources or human remains, including Native American resources would be less than significant.

Cumulative Impacts

Development of the Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to tribal cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate mitigation. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.

XIX. Utilities and Service Systems

	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?	☐	☐	☒	☐

IMPACT ANALYSIS

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Water Treatment Facilities and Existing Infrastructure

The determination of whether a project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The LADWP ensures the reliability and quality of water supply through an extensive distribution system that includes approximately 7,336 miles of pipes and 115 storage tanks and reservoirs within the City. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[190] In 2017, the LADWP's water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd.[191]

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. This is water demand would be temporary and would be provided by the water infrastructure serving the existing uses on the Project Site. Impacts on the water infrastructure due to construction activity would therefore be less than significant. The projected operational demands for water usage and fire suppression are considered. The Project's main source of water consumption would be the hotel, residential, and commercial water usage, however, fire flow demands have a greater impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute

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[190] *U.S. Department of Energy, Los Angeles Department Of Water And Power: Los Angeles Aqueduct Filtration Plant Modernization – Oxygen Plant Replacement accessed November 2021.*

[191] *Los Angeles Department of Water and Power, Water, L.A.'s Drinking Water Quality Report, accessed November 2021.*

(gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. Based on correspondence with the LAFD (see Appendix O.3 of this SCEA), minimum fire flow requirement for the Project is 6,000 to 9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously. A Service Advisory Request/Fire Service Pressure Flow Report (SAR) would be prepared and approved for the Project by the Department of Water and Power (LADWP) to ensure that fire flow requirements are considered adequate for the Project Site. With approval from LADWP, development of the Project would result in a less than significant impact to fire flow water usage.

As shown in Table 4.30 below, the Project would generate a net increase in water demand of approximately 107,702 gallons per day (gpd) of water (121 AFY), which is well within the City's available water treatment capacity and future anticipated water demand projections. Additionally, as discussed in the Project's Water Supply Assessment prepared by LADWP (Appendix L to this SCEA), the LADWP determined that the City's water supply can accommodate the Project water demand of 121 AFY. The Project's baseline water demand was reduced by 24 AFY through implementation of the conservation ordinance and code requirements, and by 3 AFY through voluntary water conservations measures (see Project Design Feature PDF-PU-1, below). Compliance with the regulatory compliance measures and the implementation of voluntary water conservation project design features would ensure the Project's demands for potable water resources are reduced. Moreover, as discussed previously in Checklist Question XIV(a), Population and Housing, and the Project's population growth is within SCAG's forecast, the Project's increased water demand would not measurably impact the LAAFP's treatment capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Project would have a less-than-significant impact.

LADWP did not recommend any upgrades to develop the Project in the prepared Water Supply Assessment and concluded that adequate water supplies would be available to meet the Project's annual water demand. Although no system upgrades are anticipated at this time, the water system will be verified again at the time of construction. As part of the construction/building permit process, the Applicant shall confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phase. In the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment as potential physical impacts from construction in the right-of-way easements is already captured in the analysis of Project construction impacts. Additionally, this is largely due to the fact that (a) any disruption of service would be short-term, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. **Therefore, the Project would not require or result in the relocation or construction of new or expanded water treatment facilities, and potential impacts resulting from water infrastructure improvements would be less than significant.**

Table 4.30
Project Estimated Water Demand

Proposed Use	Quantity/ Unit	Water Use Factor[c] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings[d] (gpd)	Proposed Water Demand (gpd)	Proposed Water Demand (AFY)
Existing Uses (to be removed)[a]						
Office/Retail	89,510 sf	--	--	--	(1,254)	
Existing to be Removed Total:[b]					**(1,254)**	**(1.40)**
Project						
Residential: Studio	75 du	75	5,625			
Residential: 1 bd	104 du	110	11,440			
Residential: 2 bd	68 du	150	10,200			
Residential: 3 bd	3 du	190	570			
Base Demand Adjustment[e]	--	--	3,142			
Residential Total:	**250 du**		**30,977**	6,493	**24,484**	**27.43**
Hotel Room	300 rooms	120	36,000			
Base Demand Adjustment	--	--	3,261			
Hotel Total:	**300 rooms**		**39,261**	4,285	**34,976**	**39.18**
Residential Outdoor Terrace	11,430 sf	0.12	1,372			
Residential Fitness Center	2,000 sf	0.65	1,300			
Residential Indoor Lounge/Amenity Room	2,200 sf	0.05	110			
Residential Roof Terrace	5,030 sf	0.12	604			
Residential Medical Office/Retail	10,000 sf	0.25	2,500			
Residential Storage	15,850 sf	0.03	476			
Residential Leasing/Administration	1,500 sf	0.12	180			
Residential Lobby/Lounge	1,858 sf	0.05	93			
Hotel Restaurant/Retail	125 seat	30	3,750			
Hotel Outdoor Pool Terrace	4,900 sf	0.12	588			
Hotel Outdoor Event Terrace	5,200 sf	0.12	624			
Hotel Outdoor Terrace	1,470 sf	0.12	176			
Hotel Fitness Center	971 sf	0.65	631			
Hotel Storage	9,700 sf	0.03	291			
Hotel Administration	1,000 sf	0.12	120			
Hotel Lobby/Lounge	6,359 sf	0.05	318			
Hotel Meeting Rooms	5,425 sf	0.12	651			
Base Demand Adjustment[e]			14			
Total Amenities and Commercial Total:			**13,798**	640	**13,158**	**14.74**
Landscaping and Pool:[f]	**21,533 sf**	**--**	**2,311**	**557**	**1,754**	**1.96**
Covered Parking:[g]	**147,142 sf**	**0.02**	**97**	**0**	**97**	**0.11**
Cooling:[h]	**1,300 ton**	**35.64**	**46,332**	**9,266**	**37,066**	**41.52**
Total Project Site Water Demand:			**132,776**	**21,241**	**111,535**	**124.94**
Less Existing to be Removed:					*(1,254)*	*(1.40)*
Less Additional Conservation:[i]					*(2,579)*	*(2.89)*
Net Additional Water Demand:					**107,702**	**120.65**

Notes: sf =square feet; du = dwelling units; bd = bedroom; gpd = gallons per day; afy = acre-feet per year

[a] *Provided by City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope Confirmation e-mail. See Appendix A of the Water Supply Assessment. Proposed Uses that do not have additional water demands are not shown here.*

[b] *The existing water demand is based on the LADWP billing data.*

[c] *Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.*

[d] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.*

[e] *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.*

[f] *Landscaping and pool water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. This includes 64 ft by 32 ft residential swimming pool, 60 ft by 100 ft residential swimming pool, 32 ft by 30 ft residential hot tub and 35 ft by 30 ft hotel hot tub.*

[g] *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.*

[h] *Assumed to operate 24 hours/day, 7 days/week and 55% of chiller capacity.*

[i] *Water conservation due to additional conservation commitments agreed by the Applicant. See Table II of Water Supply Assessment (Appendix L of this SCEA).*

Source: LADWP, Water Supply Assessment for the South Park Towers Project, May 24, 2022, Table 1, page 8.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. The Los Angeles Sanitation & Environment (LASAN), formerly known as the Bureau of Sanitation, provides sewer service to the Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.[192] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 4.31, the Project would generate a net increase of approximately 65,329 gpd of wastewater, representing a fraction of one percent of the available capacity.

The Project area is presently served by a network of sewer lines that are located beneath most of the major streets that convey sewage from the Project Site to the HWRP. Based on the Sewer Capacity Availability Request (SCAR) from the LASAN, dated April 23, 2019, the sewer infrastructure in the vicinity of the Project includes an existing 8-inch line on Flower Street and a

[192] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, accessed November 2021.*

Table 4.31
Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Existing Uses (to be removed)			
Retail	87,731 sf	0.05 gpd/sf	4,387
Office	1,779 sf	0.12 gpd/sf	213
		Total Existing Wastewater Generation:	**4,600**
Project			
Hotel			
Guest Rooms	300 rooms	120 gpd/room	36,000
		Subtotal Hotel	***36,000***
Residential Units (250 total)			
Studio	75 du	75 gpd/du	5,625
One Bedroom	104 du	110 gpd/du	11,440
Two Bedroom	68 du	150 gpd/du	10,200
Three Bedroom	3 du	190 gpd/du	570
		Subtotal Residential	***27,835***
Commercial			
Commercial Retail	10,000 sf	0.25 gpd/sf	2,500
High-Turnover Restaurant [b]	3,120 sf (139 seats)	25 gpd/seat	3,475
		Subtotal Commercial	***5,975***
Landscaping [c]			22.40
Enclosed Parking [d]			96.75
		Total Project Site Wastewater Generation:	**69,929**
		Less Existing Wastewater Generation:	*(4,600)*
		Net Wastewater Generation:	**65,329 gpd**

Notes: sf =square feet; du = dwelling units

[a] *Consumption Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer Generation Factor for Residential and Commercial Categories table, effective April 6, 2012.*

[b] *Restaurant seats were estimated based on 15 sf per seat for the dining area, which was assumed to occupy two-thirds of the restaurant space. The remaining one-third of restaurant space is assumed to be occupied by kitchen and back of house space.*

[c] *Based on 3,665 square feet of landscaped open space area. See Estimated Total Water Use (ETWU) outdoor water use calculations (attached).*

[d] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation rates of 0.02/gpd and a use cleaning rate of 12 times per year for a 147,142 sf parking garage.*

Source: Parker Environmental Consultants, 2019.

24-inch line on Hope Street. Based on the estimated flow, LASAN concludes that the sewer system would be able to accommodate the total flow for the Project. The Applicant must install and maintain private odor trap to connect to the 24-inch line connection along Hope Street and Bureau of Engineering to approve connection methods. As part of the pre-construction process, detailed gauging and evaluation would be needed as part of the permit process to identify a specific sewer connection point for the Project Site. Through the rules and regulations established

in the City of Los Angeles Sewer Allocation Ordinance (No. 166,060), the LASAN does not make a determination of sewer capacity until LADBS has established that the Project's plans and specifications are acceptable for plan check. This process ensures that the system can accept the anticipated wastewater flows from the Project at the time of connection, as opposed to prematurely committing to projects that are in the environmental review or entitlement process. At the time of connection, the LASAN will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The Applicant has received a SCAR, dated April 23, 2019, that verified the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project. The LASAN has determined that the sewer system has sufficient capacity to serve the Project.

Based on the configuration of sewer lines serving the Project, the Project's sewer flows would be routed to the lines under Flower Street, Hope Street, and Venice Boulevard. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would typically last a few days to a few weeks. **Therefore, impacts to sewer capacity and infrastructure would be less than significant.**

Storm Drains

The Project Site is currently developed with commercial/retail land uses and a surface parking lot. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Existing storm drain lines serving the Project Site are located along Venice Boulevard and Hope Street, which are owned and maintained by the City of Los Angeles. The Project would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions. **The Project's potential impacts to storm drain capacity would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would reduce the amount of stormwater leaving the Project Site.**

Electricity Infrastructure

As discussed in response to Checklist Question VI(a), Energy, electricity service is provided by the LADWP. Based on correspondence with LADWP, there are two overhead 4.8-kV circuits that run along Venice Boulevard and Pembroke Lane adjacent to the Project Site. There are no 34.5 kV circuits in proximity to the Project Site.[193] As stated in LADWP's 2017 Power SLTRP, LADWP will continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power SLTRP considers future energy demand, advances in renewable energy

[193] *Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, South Park Towers Project, December 21, 2021 (See Appendix N.6 to this SCEA).*

resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[194] Adequate electricity service is currently provided to the Project Site and is readily available in the immediate project vicinity. The availability of electricity is dependent upon adequate generating capacity and a reliable distribution system. The estimated power requirement for the Project is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The Project would require on-site transformation and may require line extensions on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant. Construction and operation of the Project would not necessitate the construction of new electrical off-site facilities or substantial infrastructure improvements that would have the potential to cause significant environmental impacts. **As such, Project impacts to electric infrastructure would be less than significant.**

Natural Gas Infrastructure

Natural gas service is provided by Southern California Gas. As discussed in response to Checklist Question VI(a), Energy, adequate natural gas service and supplies are available in the immediate project vicinity and would be provided to the Project Site. The availability of natural gas is dependent upon adequate fuel supplies and a reliable distribution system. Construction and operation of the Project would not necessitate the construction of new off-site natural gas facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. **As such, Project impacts to natural gas infrastructure would be less than significant.**

Telecommunications

The Project Site is currently served by existing telecommunications services that exist within in the immediate Project vicinity. Telecommunication services would continue to be provided to the Project Site based on demand. Construction and operation of the Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. **As such, project impacts to telecommunication facilities would be less than significant.**

[194] *Los Angeles Department of Water and Power, 2017 Final Power Strategic Long-Term Resource Plan, accessed November 2021.*

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2020 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 565,751 AFY in 2045.[195] With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2020 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

Through the 2020 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2045, with implementation of conservation strategies and proper supply management. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2020 UWMP. As stated in the Water Supply Assessment, LADWP anticipates the projected water demand from the Project can be met during normal, single-dry, and multiple-dry water years, in addition to the existing and planned future demands on LADWP. Thus, the Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184,248, Los Angeles Ordinance No. 184,692, the 2022 Los Angeles Plumbing Code, the 2022 California Green Building Standards Code (CAL Green), and the 2023 Los Angeles Green Building Code. The Project is required to provide a schedule of plumbing fixtures and fixture fittings that reduce

[195] *City of Los Angeles Department of Water and Power, 2020 City of Los Angeles Urban Water Management Plan [2020 UWMP] accessed December 2021.*

potable water use within the development in order to exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code in accordance with the California Building Energy Efficiency Standards by 20 percent. With respect to landscaping, the Project would be required to comply with Los Angeles City Ordinance No. 170,978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water loss in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181,288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance.

As shown in Table 4.30, the Project's net increase in water demand would be 107,702 gallons per day. As discussed in the Project's Water Supply Assessment prepared by LADWP (Appendix L to this SCEA), the LADWP determined that the City's water supply can accommodate the Project water demand of 121 AFY. The Project's baseline water demand was reduced by 24 AFY through implementation of the conservation ordinance and code requirements, and by 3 AFY through voluntary water conservations measures (see Project Design Feature PDF-PU-1, below). **Compliance with the regulatory compliance measures identified above and the implementation of voluntary water conservation project design features would ensure the Project's demands for potable water resources during multiple dry years are less than significant.**

Project Design Feature

PDF-PU-1 As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

- Fixtures
  - ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle
  - High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf
  - Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm
- Landscape and Irrigation
  - Drip/Subsurface Irrigation (Micro-Irrigation)

    - Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Pool
    - Domestic Pool/Spa recirculating filtration equipment
    - Water-Saving Pool Filter

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XIX(a) above, the sewage flow will ultimately be conveyed to the Hyperion Water Reclamation Plant (HWRP), which has sufficient capacity for the Project.[196] **Therefore, impacts to wastewater treatment facilities would be less than significant.**

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the Source Reduction and Recycling Element (SRRE).

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While LASAN provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both

[196] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, accessed November 2021.*

public and private haulers is either recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. State law currently requires at least 50% solid waste diversion and establishes a state-wide goal of 75% diversion by 2020. Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. Pursuant to Chapter VI, Article 6, Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, an AB 939 Compliance Permit from LASAN.

It is assumed that the Project's solid waste would be disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 68.0 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 20 years.

The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. The Project would include 452,630 square feet of floor area (including residential, hotel, and commercial space) and approximately 147,412 square feet of parking space. Based on the construction of the new floor area, it is estimated that the construction of the Project would generate approximately 6,547 tons of debris during the demolition and construction process (see Table 4.32, below), plus an additional 28,000 cubic yards of soil export during the grading and excavation phase. All construction and demolition debris would be recycled to the maximum extent feasible. In compliance with LAMC Section 66.32.1, the Project shall provide temporary waste separation bins on-site during demolition and construction to facilitate on-site separation and recycling of demolition. Demolition debris from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon Landfill, which accepts construction waste and yard waste from areas within the County of Los Angeles. The Sunshine Canyon Landfill is located approximately 32 miles north of the Project Site. Soil export debris would be hauled to the Azusa Land Reclamation, which accepts inert solid waste. Azusa Land Reclamation is located approximately 25 miles east of the Project Site.

For recycling efforts, Waste Management Downtown Diversion accepts construction waste for recycling. Waste Management Downtown Diversion is located three miles east from the Project Site (approximately six miles round trip). Under the requirements of the hauler's AB 939 Compliance Permit from the LASAN, all construction debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

Table 4.32
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a]	Generated Waste (tons)
Demolition			
Office/Retail	67,991 sf	155 lbs/sf	5,269
Construction			
Residential (250 dwelling units)	241,510 sf	4.38 lbs/sf	529
Hotel	198,000 sf	4.38 lbs/sf	434
Commercial/Retail and Covered Ground Areas	14,335 sf	3.89 lbs/sf	28
Parking Garage	147,412 sf [b]	3.89 lbs/sf	287
		Total Debris:	**6,547**

Notes: sf= square feet
[a] *United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.*
[b] *Parking area was estimated by multiplying the hotel building footprint area by 2 since there will be two parking levels in the hotel building and multiplying the residential building by 3 since there will be three parking levels in the mixed-use residential building.*
Source: Parker Environmental Consultants, 2022.

As shown in Table 4.33, Estimated Operational Solid Waste Generation, the Project's net additional generation during operation of the Project would be 2,703 pounds per day (or approximately 1.35 tons per day), which is well within area landfills' capacity. This estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Project's solid waste would be handled by private waste collection services.

Implementation of the following code compliance measures would further reduce the Project's impacts on solid waste generation. In compliance with the LAMC Section 66.32 and AB 341, the Project shall provide readily accessible recycling areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70% by 2013, the Applicant would salvage and recycle construction and demolition materials to ensure that a minimum of 70% of construction-related solid waste that can be recycled is diverted from the waste stream. Solid waste diversion would be accomplished through the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70%. In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Sanitation & Environment. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles

solid waste in compliance with AB 341. **The amount of solid waste generated by the Project is within the available capacities of area landfills, and the Project's impacts to regional landfill capacity would e less than significant.**

Table 4.33
Estimated Operational Solid Waste Generation

Type of Use	Size [b]	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses (to be removed)			
Office/Retail (67,991 sf)	147 emp	8.93 lbs/emp/day	1,313
Total Existing Solid Waste Generation:			**1,313**
Project			
Multi-Family Residential	250 du	12.23 lbs/du/day	3,058
Commercial/Retail (13,120 sf)	34 emp	10.53 lbs/emp/day	358
Hotel	300 rooms	2 lbs/room/day	600
Total Project Solid Waste Generation:			**4,016**
Less Existing:			*(1,313)*
NET TOTAL Solid Waste Generation:			**2,703**

Notes: sf = square feet; emp = employees; du = dwelling units; lbs = pounds
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employees were projected based on 1 employee per 383 square feet of retail space and 1 employee per 463 square feet of commercial space.*
Source: Parker Environmental Consultants, 2022.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of mixed-use development with multi-family residential, hotel, and commercial/retail space. The Project would comply with all federal, state, and local statutes and regulations regarding proper disposal. **Therefore, the Project's solid waste impacts would be less than significant.**

Cumulative Impacts

Water Demand

Less Than Significant Impact. Development of the Project and related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City. Through the 2020 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2045, with

implementation of conservation strategies and proper supply management.[197] This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed in Checklist Question XIV(a), Population and Housing, the Project contributes to population and housing growth in the Central City Community Plan area is below what was projected for 2010 and would be consistent with SCAG's growth projections for the City of Los Angeles. As such, the additional water demands generated by the Project are accounted for in the 2020 UWMP.

Table 4.34, Estimated Cumulative Water Demand, estimates that the Project and related projects would demand approximately 337,573 gallons per day or 0.34 mgd, which represents approximately 0.2 percent of the available capacity in the LAAFP, depending on the season. Additionally, the Project's growth is consistent with SCAG's growth projections for the Los Angeles subregion. With approval of the requested discretionary actions, the Project is consistent with the underlying allowable uses per the LAMC and would not exceed the allowable density for the Project Site or exceed the available capacity in the local aqueduct. **As such, the additional water demands generated by the Project are accounted for in the 2020 UWMP, and impacts associated with increased water demand would not be cumulative considerable, and cumulative impacts on water supply would be less than significant.**

Table 4.34
Estimated Cumulative Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Related Projects			
Dwelling Units [b]	1,144 du	150 gpd/du	171,600
Bar and Cocktail	3,685 sf	0.72 gpd/sf	2,653
Commercial/Retail	53,238 sf	0.05 gpd/sf	2,662
Hotel	132 rooms	120 gpd/room	15,840
Medical Office	148,465 sf	0.25 gpd/sf	37,116
Total Related Projects Water Demand:			***229,871***
Total Project Net Additional Water Demand:			*107,702*
TOTAL CUMULATIVE:			**337,573**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day
[a] *Based on sewer generation factors provided by City's Bureau of Sanitation, effective April 6, 2012.*
[b] *Dwelling units include condominiums and apartment units. Consumption rate was based on two bedrooms per unit as a conservative estimate.*
Parker Environmental Consultants, 2022.

[197] *City of Los Angeles Department of Water and Power, 2020 City of Los Angeles Urban Water Management Plan [2020 UWMP], page ES-28, accessed December 2021.*

Wastewater Generation

Less Than Significant Impact. Development of the Project in conjunction with the related projects would further increase regional demands on HWRP's capacity.

Local Wastewater Generation

Similar to the Project, each related project would be required to obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Project would require approval from the LASAN, signifying that the sewer lines serving the Project Site have adequate capacity, the Project would not be expected to contribute to a local cumulative impact. Locally, the Project would not be cumulatively considerable.

Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. Future wastewater flows are expected to increase due to growth in population as well as commercial, and industrial activity. The 2020 UWMP, in conjunction with SCAG census data, projects a growth of an additional 765,112 people within the City by 2045. The population is expected to continue to grow over the next 25 years at a rate of 0.5 percent annually. This represents a reduction to the historical 1 percent annual growth rate that occurred between 1980 and 2010. Population growth is expected to lead to an increase in commercial and industrial activity, likely resulting in an increase in wastewater flows in the City's service area. In general, the UWMP states that dry weather wastewater influent flow projections for the WRPs are expected to increase by 20 percent over the next 25 years. As shown in Table 4.35 below, the combined flow of all four wastewater reclamation plants is projected to increase from roughly 328 mgd in 2016 to 376 mgd in 2040, representing an approximate increase in 13 percent by 2040. Therefore, it is anticipated that this projection of 376 mgd would be well below the 800 mgd flow capacity in the HWRP and would not be significantly reduced with the cumulative wastewater generation from the related projects and Project. **As such, cumulative impacts with respect to wastewater demand would be less than significant.**

Table 4.35
Projected Wastewater Flows - Wastewater Facilities Plan
One Water LA 2040 Plan

Water Reclamation Plant (WRP)	Projected Annual Average Wastewater Flows by Year (mgd) [a, b, c]			
	2016	**2020**	**2030**	**2040**
Hyperion	250	256	275	283
Donald C. Tillman	47	46	51	53
Los Angeles - Glendale	17	21	22	22
Terminal Island	14	16	18	18
Total	328	339	366	376

Notes:
[a] *Flows are rounded to the nearest mgd.*
[b] *Low flow diversions are assumed to be implemented starting in year 2030.*
[c] *mgd = million gallons per day.*
Source: One Water LA 2040 Volume 2 – Wastewater Facilities Plan, January 2018, at page ES-8.

Solid Waste

Less Than Significant Impact. Development of the Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2019 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 154.3 million tons in the horizon year 2032 will exceed the 2019 remaining permitted Class III landfill capacity of 148.4 million tons.[198] However, solutions to resolve the regional solid waste disposal needs beyond 2032 are continuously being investigated at the state, regional, and local levels. Reliance on existing permitted in-County landfill capacity alone is insufficient in meeting the County's long-term disposal needs. In order to maintain adequate disposal capacity, individual jurisdictions within the Los Angeles County must continue and pursue all of the following strategies: maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and out-of-county disposal (including waste-by-rail). By incorporating these strategies, the County may further ensure adequate disposal capacity is available throughout the 15-year planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

The City of Los Angeles Solid Waste Integrated Resources Plan sets forth strategies that would provide adequate landfill capacity through 2032 to accommodate anticipated growth. The LA Sanitation & Environment has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with the Project and related

[198] *County of Los Angeles Department of Public Works, The Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020, accessed December 2021.*

projects, collectively, is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE.

As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[199] Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. These programs include Green Mulching and Composting workshops, black yard trimming recycling cans, the City-owned Central Los Angeles Refuse Transfer Station and Residential Special Material and Electronics Recycling or S.A.F.E. Centers. New programs are being implemented to increase the amount of waste diverted by the City, including: multi-family recycling, food waste recycling, commercial recycling and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030.

Thus, the Project's contribution to cumulative impacts would continue to decrease as the City increases waste diversion rates in accordance with City goals. Moreover, as with the Project, other related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. **Therefore, the Project's contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.**

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒

[199] *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, accessed November 2021.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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 wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of 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 (Responses a through d). The Project Site is located in an urbanized area in Downtown Los Angeles with no natural vegetation. The Project Site is improved with commercial structures and parking lots. There are no state responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.[200] Therefore, this checklist question is not applicable to the Project and no impact would occur.

[200] *City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, accessed November 2021.*

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

IMPACT ANALYSIS

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. A significant impact may occur only if the Project would have an identified potentially significant impact for any of the above issues. The Project is located in a highly urbanized area, development of the Project would result in a less than significant impact to biological and cultural resources with adherence to regulatory compliance measures. The Project would not substantially degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, no impact would occur.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the Project, in conjunction with the other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together.

As concluded in this analysis, the Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, utilities and service systems, and wildfire would be less than significant. As such, the Project's contribution to cumulative impacts would be less than significant.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified within this SCEA analysis.

Section 5. Mitigation Monitoring Program

1.1 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 proposed South Park Towers Project (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 Sustainable Communities Environmental Assessment (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 (PDF) and applies mitigation measures (MM) as necessary to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

1.2 PURPOSE

It is the intent of this MMP to:

1. Verify compliance with the project design features and mitigation measures identified in the SCEA;

2. Provide a framework to document implementation of the identified project design features and mitigation measures;

3. Provide a record of mitigation requirements;

4. Identify monitoring and enforcement agencies;

5. Establish and clarify administrative procedures for the clearance of project design features and mitigation measures;

6. Establish the frequency and duration of monitoring; and

7. Utilize the existing agency review processes wherever feasible.

1.3 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.

1.4 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF, RCM, 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, RCM, 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, RCMs, 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 report to the Enforcement Agency of any non-compliance with the PDFs, RCMs, and MMs within two businesses 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.

1.5 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, RCMs, and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs, RCMs, and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF, RCM, 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, RCMs, or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF, RCM, or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF, RCM, 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, RCM, 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, RCM, or MM results in a substantial change to the Project or the non-environmental conditions of approval.

1.6 MITIGATION MONITORING PROGRAM

A. Air Quality

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

No Project Design Features are required for the Project.

B. Biological Resources

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

No Project Design Features were identified for the Project.

C. Cultural Resources

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

No Project Design Features were identified for the Project.

D. Geology and Soils

Mitigation Measures

No mitigation measures were required for the Project.

Project Design Features

No project design features are identified for the Project.

E. Greenhouse Gas Emissions

Mitigation Measures

No mitigation measures were required for the Project.

Project Design Features

No project design features are identified for the Project.

F. Hazards and Hazardous Materials

Mitigation Measures

MM-HAZ-1 Soil Management Plan

- A Soils Management Plan (SMP) shall be prepared and implemented to provide a framework under which work can proceed safely and contaminated soils can be properly handled, segregated, stockpiled and disposed of at a licensed disposal facility. Proper handling of the contaminated media would be required regardless of the contamination source.
- The Applicant shall provide confirmation that the VOC concentrations in soil vapor meet the residential scenario Department of Toxic Substances Control-modified Screening Levels (DTSC-SLs) established in DTSC's Human Health Risk Assessment (HHRA).
- In the event that hazardous soils or materials are discovered, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) prior to the issuance of a use of land or building permit, or issuance of a change of occupancy.
- The SMP shall also contain procedures to be followed in the event that any undocumented subsurface features of potential environmental concern are encountered during the excavation grading, and/or other earthmoving activities. These procedures shall include safety training, testing protocols, decontamination and decommission.

- The SMP shall also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses. Impacted soil removed from the Project Site shall comply with the following:
    - A qualified environmental consultant shall be present on the Project Site at the start of soil disturbance activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations of evidence of contamination (primarily VOCs, which includes PCE and TCE.
    - Soil Monitoring during soil disturbance include visual observation (soil staining), representative sampling via a photo ionization detector, and/or VOC monitoring.
    - Timely testing and sampling of soils is required so that VOC-contaminated soils can be separated from inert soils for proper disposal.
    - Impacted soil shall be transported to an approved treatment/disposal facility.
    - When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
    - Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
    - The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
    - The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.
    - Weekly inspections of all waste shall be performed by a qualified environmental consultant to document that waste is being managed in accordance with the SMP.

- **Enforcement Agency:** South Coast Air Quality Management District, Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Pre-Construction, Construction
- **Monitoring Frequency:** Once during plan check; Ongoing during field inspection
- **Action Indicating Compliance:** Building and Safety permit signoff

Project Design Features

No project design features are identified for the Project.

G. Hydrology and Water Quality

Mitigation Measures

No mitigation measures were required for the Project.

Project Design Features

No project design features are identified for the Project.

H. Noise

Mitigation Measures

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

MM-N-1 To the maximum extent possible, demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-2 The project contractor shall use power construction equipment with noise shielding and muffling devices.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-3 The project contractor shall erect temporary noise-attenuating sound barriers along the northern and eastern perimeters of the Project Site fronting Venice Street and Hope Street. The sound barrier along the Venice Street frontage shall be designed to provide a minimum sound attenuation of -12.5 dBA. The sound barrier along Hope Street shall be designed to provide a minimum sound attenuation of -10 dBA. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off-site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-4 During structural framing, the project contractor shall utilize temporary portable acoustic barriers, partitions, or acoustic blankets to effectively block the line-of-sight between noise producing equipment and the adjacent residential land uses for purposes of ensuring noise levels at the adjacent sensitive receptors does not exceed 5 dBA over the ambient noise levels.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-5 An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

MM-N-6 The Applicant and contractors shall maintain ongoing contact with administrator of Metro Charter Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. There shall be no staging or parking of construction vehicles, including vehicles to transport workers on Hope Street, north of Venice Boulevard adjacent to the school. Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on Hope Street, north of the Venice Boulevard, adjacent to the school, during school hours.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

PPM-NOISE-2 Groundborne Vibration. The Project would incorporate the following measures from the SCAG EIR Mitigation Measure PPM-NOISE-2:

(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.

- **Enforcement Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Agency:** Department of Building and Safety, Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

Project Design Features

No project design features are identified for the Project.

I. Public Services

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

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

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once, prior to issuance of building permit
- **Action Indicating Compliance:** Sign-off on LAPD reviewed diagrams; issuance of building permit

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

- **Enforcement Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Agency:** Los Angeles Police Department, Department of City Planning
- **Monitoring Phase:** Pre-Construction
- **Monitoring Frequency:** Once during plan check; Once prior to issuance of building permit
- **Action Indicating Compliance:** LAPD approval of plans; issuance of building permit

J. Transportation

Mitigation Measures

MM-T-1: Transportation Demand Management (TDM) Promotions and Marketing

The Project shall provide all eligible employees and residents with marketing and promotional materials to educate and inform travelers about site-specific transportation options and effects of their travel choices.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Certificate of Occupancy.

MM-T-2 Shared Mobility

The project shall provide on-demand access to shared mobility options as an incentive to consider other transportation travel modes. The Project shall provide five car-share spaces, ten bike-share spaces, and a rideshare program.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Site Plan Review
- **Monitoring Frequency:** Once during plan check; on-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

MM-T-3 Unbundle Parking

The Project shall provide unbundled parking which separates the leasing of parking from leasing of apartments so that residents must specifically opt in to paying to park a car. The analysis estimated that a parking space would cost at least $220 per month for residents to lease. The Applicant shall unbundle parking costs from residential lease payments and charge at least $220 per month per parking space for residents who park on site.

- **Enforcement Agency:** Department of Transportation, Department of City Planning
- **Monitoring Agency:** Department of Transportation, Department of City Planning
- **Monitoring Phase:** Certificate of Occupancy
- **Monitoring Frequency:** On-going during operation.
- **Action Indicating Compliance:** Issuance of building permit; Certificate of Occupancy.

Project Design Features

No project design features are required for the Project.

K. Tribal Cultural Resources

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

No project design features are required for the Project.

L. Utilities and Service Systems

Mitigation Measures

No mitigation measures are required for the Project.

Project Design Features

PDF-PU-1 As part of its application for a water supply assessment from the LADWP, the Applicant would include the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project:

- Fixtures
  - ENERGY STAR Certified Residential Dishwashers – standard with 3.0 gallons per cycle in lieu of 3.5 gallons per cycle
  - High Efficiency Toilets with flush volume of 1.1 gallons of water per flush (gpf) in lieu of 1.28 gpf
  - Showerheads with flow rate of 1.5 gallons per minute (gpm) in lieu of 1.8 gpm
- Landscape and Irrigation
  - Drip/Subsurface Irrigation (Micro-Irrigation)
  - Proper Hydro-zoning/zoned Irrigation (groups plants with similar water requirements together)
- Pool
  - Domestic Pool/Spa recirculating filtration equipment
  - Water-Saving Pool Filter

- **Enforcement Agency:** Department of City Planning; Los Angeles Department of Water and Power
- **Monitoring Agency:** Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once prior to issuance of building permit
- **Action Indicating Compliance:** Issuance of building permit; Field inspection sign-off

M. Mandatory Findings of Significance

See above mitigation measures and project design features.

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Section 7. References, Acronyms, and Abbreviations

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2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association

CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHRIS	California Historical Resources Information Systems
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System

EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value

Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO_2	nitrogen dioxide
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District

SCCIC	South Central Coastal Information Center
SCG	Southern California Gas Company
SCH	State Clearinghouse
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency

WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System