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

INITIAL STUDY

The 2830 Prewett Project

Case Number: ENV-2023-5352-MND

Project Location: 2824 — 2830 N. Prewett Street, Los Angeles, California 90031

Community Plan Area: Northeast Los Angeles

Council District: 1—Hernandez

Project Description: The Project proposes to develop the 9,536-square-foot (0.22-acre), vacant lot with a new, two-story, 3,938-square-foot, single-family dwelling with an attached, two-car garage and an attached, 800-square-foot Accessory Dwelling Unit with separate entry. The Project would include two additional uncovered parking spaces at the rear yard; 2,913 square-feet of landscaping, including low impact development stormwater infiltration planters; a 482-square-foot pool, and two retaining walls measuring up to six feet in height. The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading. No imported material would be required and approximately 645 cubic yards would be exported for disposal at an inert waste landfill.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra Consulting, Inc.

APPLICANT:

Phillip Wilson, Dennis Holmes, and Stanislav Troy

January 2025

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1 INTRODUCTION

An application for the proposed 2830 Prewett Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required. This Initial Study and Mitigated Negative Declaration (IS/MND) evaluates potential environmental effects resulting from construction, implementation, and operation of the proposed Project. Based on the analysis provided within this IS/MND, the City has concluded that the Project would not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This IS/MND is intended as an informational document and is ultimately required to be adopted by the decision makers prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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 or a Mitigated Negative Declaration.

This IS/MND has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document.

1.2 ORGANIZATION OF THE INITIAL STUDY

This IS/MND is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

5 MITIGATION AND MONITORING PROGRAM

Contains the Mitigation Monitoring Program for the Project, including administrative procedures and mitigation enforcement.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**THE 2830 PREWETT PROJECT**
ENVIRONMENTAL CASE NO.	ENV-2023-5352-MND
RELATED CASES	ZA-2021-5204-ZAD, ZA-2021-5204-ZAD-1A ENV-2021-5205-CE

PROJECT LOCATION	**2824—2830 N PREWETT STREET** **LOS ANGELES, CA 90031**
COMMUNITY PLAN AREA	NORTHEAST LOS ANGELES
GENERAL PLAN DESIGNATION	LOW RESIDENTIAL
ZONING	[Q]R1-1D-HCR
COUNCIL DISTRICT	1—HERNANDEZ

LEAD CITY AGENCY	**CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING**
STAFF CONTACT	LINDA LOU
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PHONE NUMBER	(323) 829-4195

PROJECT DESCRIPTION

The Project proposes to develop the 9,536-square-foot (0.22-acre), vacant lot with a new, two-story, 3,938-square-foot, single-family dwelling with an attached, two-car garage and an attached, 800-square-foot Accessory Dwelling Unit with separate entry. The Project would include two additional uncovered parking spaces at the rear yard; 2,913 square-feet of landscaping, including low impact development stormwater infiltration planters; a 482-square-foot pool, and two retaining walls measuring up to six feet in height. The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading. No imported material would be required and approximately 645 cubic yards would be exported for disposal at an inert waste landfill.

(For additional detail, see "**Section 3, PROJECT DESCRIPTION**").

ENVIRONMENTAL SETTING

The Project Site is currently vacant and is located in a hillside area in an urban portion of the Northeast Los Angeles Community Plan area. The land uses within the general vicinity consist of vacant parcels zoned for low residential uses and single-family residences, which vary in building style and period of construction.

(For additional detail, see "**Section 3, PROJECT DESCRIPTION**").

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

- None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

	1/15/2025
SIGNATURE	**DATE**
Linda Lou, City Planner	(213) 978-1473
PRINTED NAME, TITLE	**PHONE NUMBER**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

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3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes to develop the 9,536-square-foot (0.22-acre), vacant lot with a new, two-story, 3,938-square-foot, single-family dwelling with an attached, two-car garage and an attached, 800-square-foot Accessory Dwelling Unit (ADU) with separate entry. The Project would include two additional uncovered parking spaces at the rear yard; 2,913 square-feet of landscaping, including low impact development (LID) stormwater infiltration planters; a 482-square-foot pool, and two retaining walls measuring up to six feet in height. The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading. No imported material would be required and approximately 645 cubic yards would be exported for disposal at an inert waste landfill.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 2824—2830 N. Prewett Street in the Northeast Los Angeles Community Plan area in the City of Los Angeles. The Project Site fronts N. Prewett Street, an undeveloped paper street, to the north; and N. Thomas Street, a dirt road adjacent to the Site, to the east. Both N. Prewett Street and N. Thomas Street are Substandard Hillside Limited Streets. As shown in **Figure 3-1, Project Location Map**, at the end of **Section 3, Project Description**, regional access to the area of the Project Site is provided by the Arroyo Seco Parkway (CA-110), approximately 0.6-mile to the north and by the Golden State Freeway (Interstate [I]-5), approximately 0.8-mile to the west. Local access to the Project Site is provided via N. Thomas Street. The Project Site is located approximately 0.4-mile north of the Broadway & Thomas bus stop for Los Angeles County Metropolitan Transportation Authority ("Metro") Line 182 service with stops approximately every 30 minutes during weekdays and weekends/holidays and for Metro Line 45 service with stops approximately every 10 minutes during weekdays and weekends/holidays.

3.2.2 Existing Conditions

The approximately 9,536-square-foot (0.22-acre) Project Site consists of two lots associated with Assessor Parcel Numbers (APN) 5208-015-001 and 5208-015-002. As shown in **Figure 3-2, Aerial View of Project Site**, at the end of **Section 3, Project Description,** the Project Site is currently vacant and undeveloped. The Project Site only contains annual weeds with no trees or shrubs.

The Project Site is zoned [Q]R1-1D-HCR (Qualified One-Family Residential, Height District 1 with Development Limitations, Hillside Construction Regulation) and has a General Plan Land Use Category of Low Residential. The Project Site is located in a Hillside Area; a Tier 1 Transit Oriented Community (TOC); an Urban Agriculture Incentive Zone; a Very High Fire Hazard Severity Zone; and a Special Grading Area (Bureau of Engineering [BOE] Basic Grid Map A-13372). Additionally, the Project Site is subject to

the regulations/requirements of the Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations (ZI No. 2462); Northeast Los Angeles Hillsides (ZI No. 2399); State Enterprise Zone: East Los Angeles (ZI No. 2129); Transit Priority Area in the City of Los Angeles (ZI No. 2452); the Hillside Construction Regulation District: Northeast Los Angeles (ZI No. 2467); and Assembly Bill (AB) 1482: Tenant Protection Act (only if the owner is a corporation, limited liability company, or a real estate investment trust).

3.2.3 Surrounding Land Uses

The land uses within the general vicinity consist of vacant parcels and single-family residences, which vary in building style and period of construction. Properties in the surrounding area are designated Low Residential and zoned RE and R1 for Residential Estate and One-Family Residential, respectively. The Project Site is bound by undeveloped hillside parcels to the north across N. Prewett Street, undeveloped hillside parcels to the east across N. Thomas Street, finished and unfinished single-family residences to the south, and undeveloped hillside parcels to the west.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As shown in **Figure 3-3, Project Plot Plan**, at the end of **Section 3, Project Description,** the Project proposes to develop the 9,536-square-foot (0.22-acre), vacant lot with a new, two-story, 3,938-square-foot, single-family dwelling with an attached 800-square-foot ADU. The Project would result in a residential floor area (RFA) of 3,938 square feet. RFA calculations can be seen on **Figure 3-4, Residential Floor Area**, at the end of **Section 3, Project Description**. The single-family residence would be a four-bedroom/five-bathroom dwelling and the ADU would be a two-bedroom/one-bathroom dwelling. The Project would be built into the hillside with the height of all proposed structures not extending beyond a 15-foot envelope above the existing grade. The single-family residence would be two-stories and a maximum height of 22 feet high above finished grade, while the attached ADU would be a split level with a maximum height of 16 feet, 8 inches. An upper deck/roof garden, lower pool deck/lounge, BBQ area, and a jacuzzi and pool would also be constructed.

Vehicular access to the Project Site would be via a driveway off of N. Thomas Street into a two-car, attached garage and a second driveway into a separate, uncovered parking area adjacent to the residence's southern facade in the rear yard that would accommodate two additional parking spaces. The ADU would be accessed by a separate pedestrian entry via steps along the residence's northern facade.

The Project would have a building footprint of 3,805 square feet. Approximately 2,913 square-feet of landscaped area would be provided, including LID stormwater infiltration planters. Impermeable hardscape, in the form of the entry walk/steps, backyard slope steps, pool coping, and landscape walls, would cover approximately 455 square feet while permeable hardscape, including permeable pavers in the driveway and BBQ area, permeable decks, permeable steps on the north side, and mulched areas, would cover approximately 1,881 square feet.

The Project proposes two retaining walls: retaining wall No. 1 would be located at the pool deck and would have a length of 62 feet and a height of six feet; and retaining wall No. 2 would be located at the house entry area and would have a length of 35 feet, six inches and a height of six feet. Both retaining walls would be constructed of board formed concrete. The Project would include a six-foot, 11-inch front yard setback, six-foot side yard setbacks, and 15-foot rear yard setback.

As shown in **Figure 3-5, Roadway Improvements**, N. Thomas Street would be widened to a minimum of 20 feet and a three-foot dedication along N. Thomas Street would be included. The Project would also create a hammerhead turn-around at the top of N. Thomas Street at its intersection with N. Prewett Street sized to accommodate emergency vehicle maneuvering.

Project cross-sections, elevations, and renderings can be viewed in **Figure 3-6** through **Figure 3-10** at the end of **Section 3, Project Description**. A full set of the Project's plans are also provided as **Appendix A** to this IS/MND.

3.3.2 Design and Architecture

The proposed residence would be two-story, wood and concrete construction, and would use site-built structural components. The material palette of the proposed residence includes warm-neutral tones and a combination of natural materials. The architecture is a modern approach, with flat roofs, clean lines, straight edges, and walls and entries to let in natural light. The Project development and design would be consistent with the Northeast Los Angeles Hillsides Zone Change Ordinance and the Landform Grading Manual in order to ensure the development would be compatible with the natural characteristics of the hillside.

3.3.3 Sustainability Features

The proposed residence would meet all City Building Code and Title 24 requirements. As such, the building would incorporate eco-friendly and recycled building materials, systems, and features wherever feasible, including energy efficient appliances, water saving/low-flow fixtures, green roofs, permeable pavers, non-volatile organic compound paints/adhesives, drought-tolerant planting, weather- or soil-based automatic irrigation system controllers, and a high-performance building envelopment.

The Project would install a raceway located, sized, and identified/reserved for future electric vehicle (EV) charging pursuant to Los Angeles Municipal Code (LAMC) Section 99.4.106.4.2. In compliance with LAMC Section 99.04.211.4, the proposed residence would be solar-ready should future homeowners decide to install solar panels. The residence would be all-electric and would not include connection to existing natural gas supply lines consistent with LAMC Section 99.04.106.8.

3.3.4 Anticipated Construction Schedule

The Project would be constructed over approximately 12 months. Construction activities would include clearing of weeds and ground cover, grading the Site for development, construction of the proposed new single-family residence and attached ADU, and installation of landscaping. Demolition activities are anticipated to start in November 2025, and construction completion and building occupancy is anticipated for November 2026. The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill

for a total of 909 cubic yards of grading. No imported material would be required and approximately 645 cubic yards would be exported for disposal at an inert waste landfill.

3.4 REQUESTED PERMITS AND APPROVALS

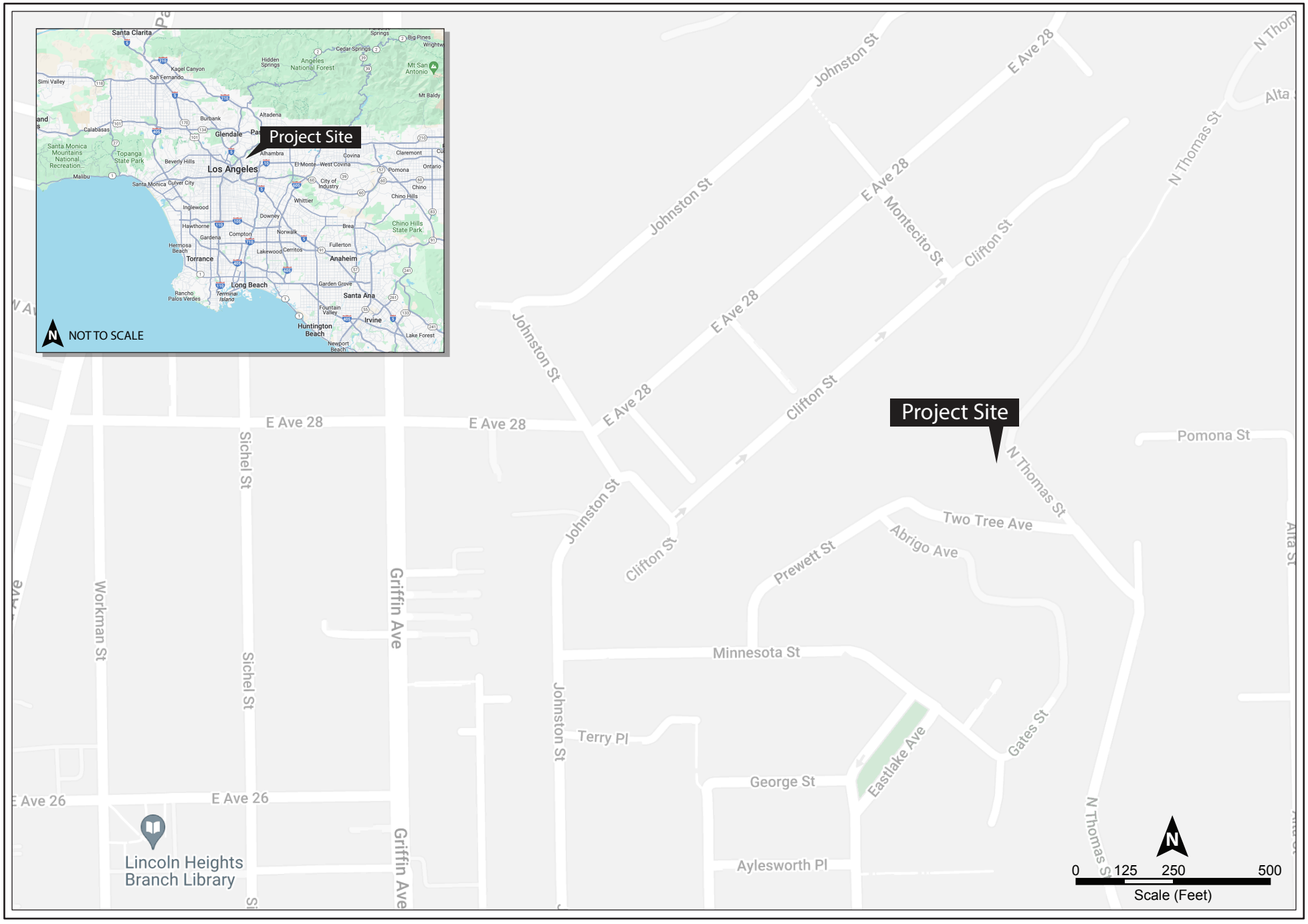
The list below includes the anticipated requests for approval of the Project. The IS/MND will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. City departments, commissions, and councils that may use this IS/MND in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council.

The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

(1) Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Prewett Street) without providing a 20-foot wide adjacent minimum roadway adjacent to the property as required by LAMC Section 12.21C.10(i)(2);

(2) Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Thomas Street) where a minimum 20-foot wide Continuous Paved Roadway is not provided from the driveway apron to the boundary of the Hillside Area, as required by LAMC Section 12.21C.10(i)(3); and

(3) Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to, haul route approval, grading permits, excavation permits, foundation permits, and building permits, in order to execute and implement the Project.

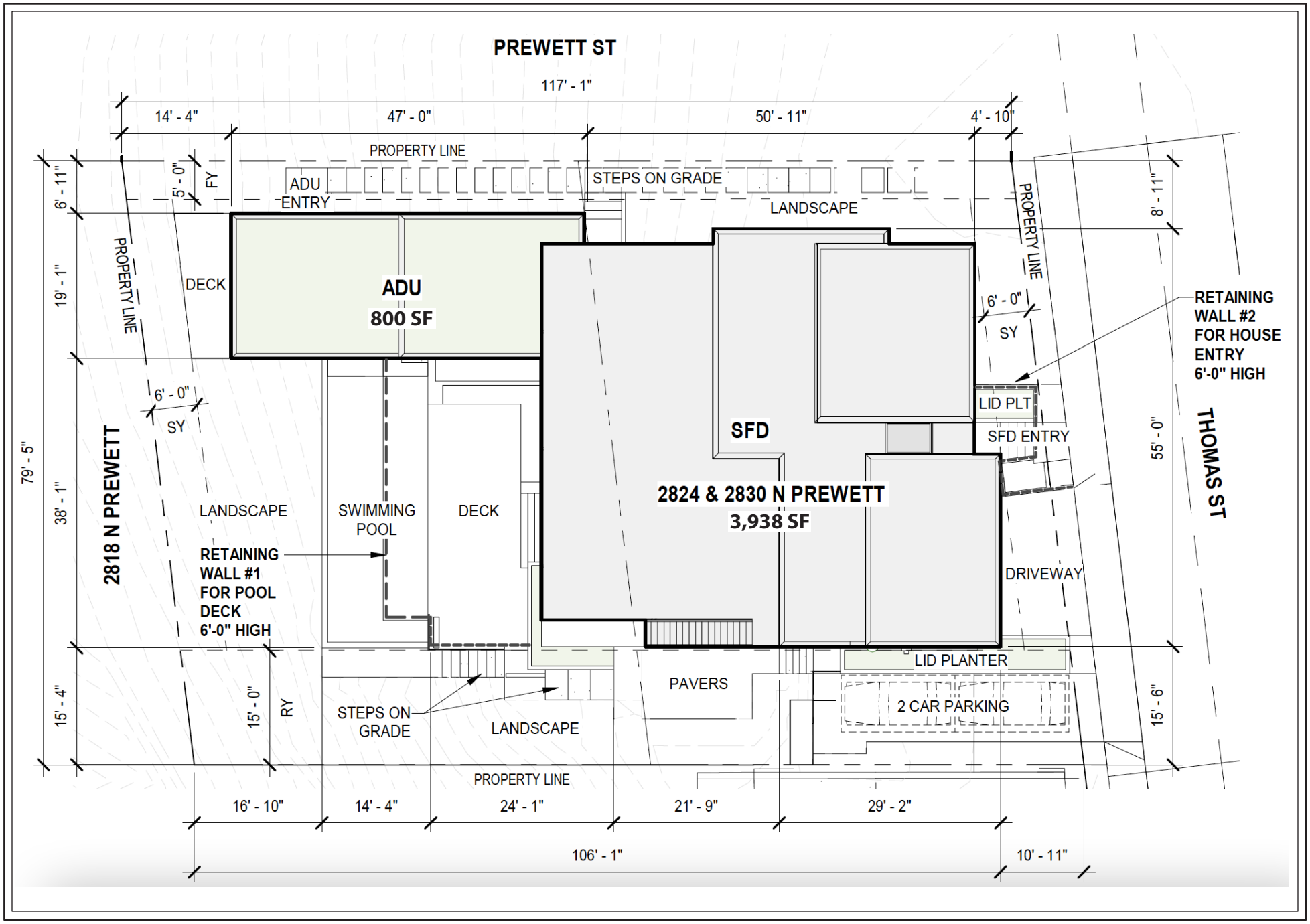


Source: Google Maps, 2023

Figure 3-1
Project Location Map

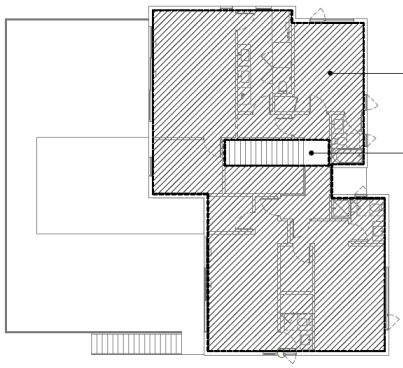
Source: GoogleEarth Pro, 2023

Figure 3-2
Aerial View of Project Site

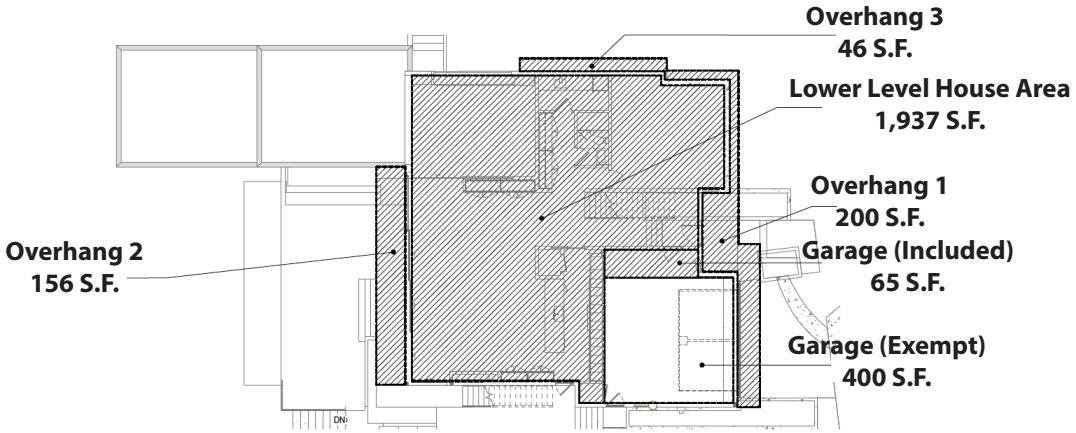


Source: Moura Design, 2024

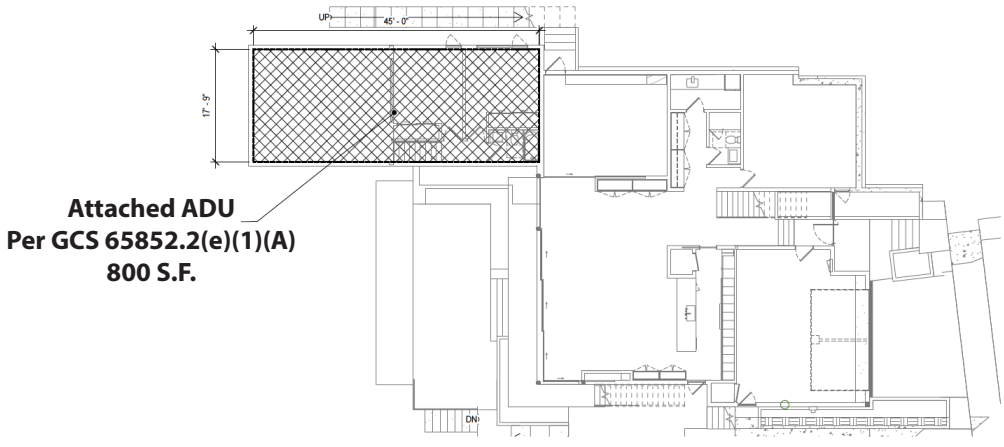
Figure 3-3
Project Plot Plan



UPPER LEVEL



LOWER LEVEL



ADU

RFA CALCULATION:

RFA ALLOWABLE: 4,033.4 SF (SEE SLOPE BAND ANALYSIS)

RFA ACTUAL SIZE
(N) SFD 3,873 sf + (N) GAR 465 sf - (400 sf) EXEMPT = 3,938 sf
(N) ADU 800 sf

TOTAL RFA = 4,738 sf - (800 sf) ADU EXEMPT PER GCS 65852.2(e)(1)(A) = 3,938 sf

BASE FLOOR AREA COMPARISON

BASE FLOOR = 2,404 sf x 75% = 1,803 sf
SECOND FLOOR = 1,533 sf / 2,404sf = 64% OF BASE FLOOR

AREA CALC. PER LAMC RFA	
LOWER LEVEL	
L.L. HOUSE AREA	1937 SF
OVERHANG 1	200 SF
OVERHANG 2	156 SF
OVERHANG 3	46 SF
GARAGE (INCLUDED)	65 SF
	2404 SF
UPPER LEVEL	
U.L. HOUSE AREA	1533 SF
	1533 SF
TOTAL AREA	3938 SF

BUILDING AREA PER BHO:

AREA CONFINED WITHIN EXTERIOR WALLS EXCLUDING:

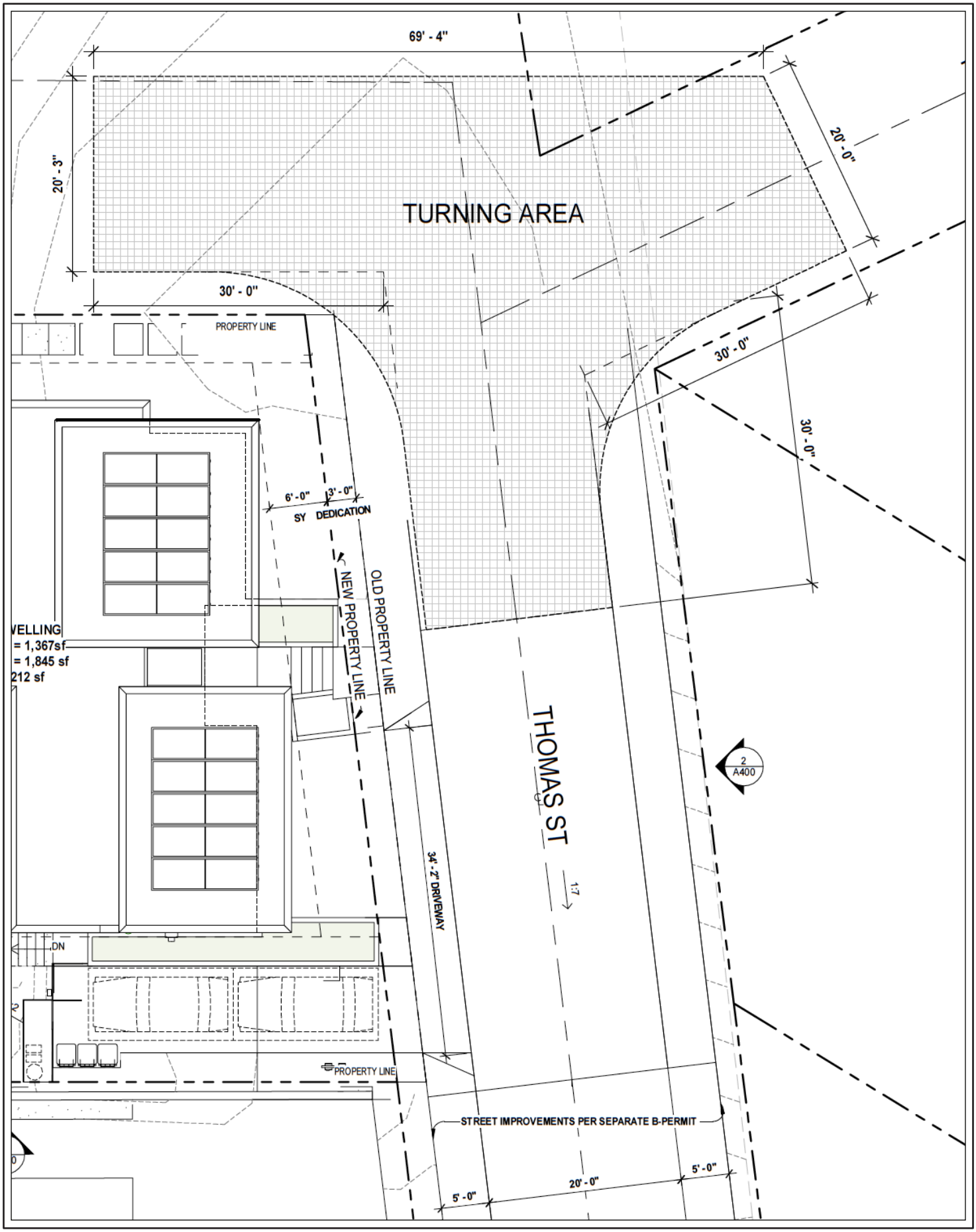
- THE FIRST 400 SF OF COVERED PARKING AREA, OR 400 SF IF PARKING IS IN THE REAR HALF OF THE LOT OR 55 FT FROM FRONT PL.
- LATTICE ROOF PORCHES, PATIOS AND BREEZEWAYS
- DETACHED ACCESSORY BUILDINGS NOT EXCEEDING 200 SF, TOTAL OF BUILDINGS NOT TO EXCEED 400 SF;
- BASEMENTS

INCLUDING:

- ANY FLOOR OR PORTION OF A FLOOR W/ A CEILING HEIGHT GREATER THAN 14' SHALL COUNT 2X THE SQUARE FOOTAGE OF THAT AREA;
- THE AREA OF AN ATTIC OR PORTION OF AN ATTIC WITH A CEILING HEIGHT OF MORE THAN 7 FEET SHALL BE INCLUDED IN THE RFA;
- THE AREA OF STAIRWAYS AND ELEVATOR SHAFTS SHALL ONLY BE COUNTED ONCE.

Source: Moura Design, 2024

Figure 3-4
Residential Floor Area



Source: Moura Design, 2024

Figure 3-5
Roadway Improvements

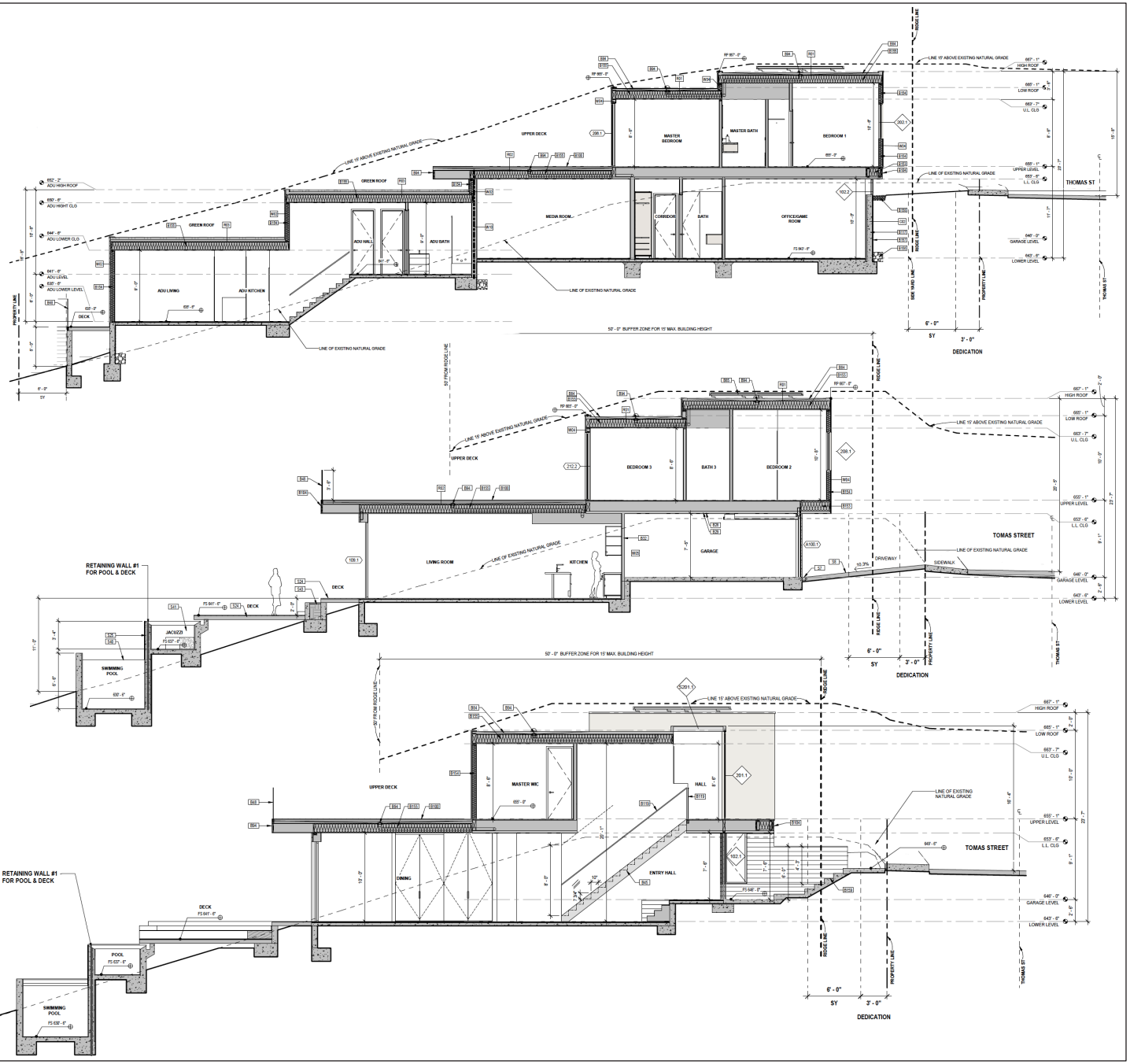
KEYNOTES SCHEDULE - SECTIONS	
#	BUILDING KEYNOTES TEXT
B28	GARAGE TO BE SEPARATED FROM HABITABLE ROOMS ABOVE BY 5/8" TYPE X GYPSUM BOARD OR EQUIVALENT (TABLE R302.6)
B29	DUCTS PENETRATING THE WALLS OR CEILINGS SEPARATING THE DWELLING FROM THE GARAGE SHALL BE CONSTRUCTED OF A MINIMUM NO. 26 GAGE SHEET STEEL OR OTHER APPROVED MATERIAL AND SHALL NOT HAVE OPENINGS INTO THE GARAGE (R302.5.2).
B32	GARAGE TO BE SEPARATED FROM DWELLING UNIT BY 1/2" GYPSUM BOARD MIN. (TABLE R302.6)
B45	STAIRS - 7.75" MAX RISER & 10" MIN TREAD. 36" MIN. CLEAR WIDTH. 6'-8" MIN. HEAD ROOM CLEARANCE. SEE DETAILS AND FINISH SCHEDULE.
B48	GLASS GAURDRAIL, CLEAR TEMPERED GLASS. 42" HIGH A.F.F. GUARDRAIL SHOE RECESSED INTO DECK. SEE DETAILS
B84	COOL ROOF MEMBRANE PER SPEC. SEE DETAILS
B85	SOLAR PANEL SEE ENERGY CALCULATIONS
B94	ROOF DRAIN W/ CONCEALED DRAIN PIPE. CONNECT TO STORMWATER MITIGATION SYSTEM. SEE DETAILS

KEYNOTES SCHEDULE - SECTIONS	
#	BUILDING KEYNOTES TEXT
B100	WOOD DECK ON PT WOOD FRAMING. PROVIDE CROSS DRAINAGE UNDER FRAMING INTO FLOOR DRAIN. SEE FINISH SCHEDULE AND DETAILS.
B104	METAL FASCIA. SEE FINISH SCHEDULE AND DETAILS
B117	RETAINING WALL. SEE STRUCTURAL AND CIVIL DRAWINGS
B119	STAIRS - CLEAR TEMPERED GLASS GUARDRAIL WITH NICKEL SATIN COLOR ANODIZED ALUMINUM CAP. SEE DETAILS, FINISH SCHEDULE.
B153	OVERHANG INSULATION, R-19 BATH INSULATION. SEE ENERGY CALCULATION A060 & A061
B154	WALL INSULATION, R-21 BATH CAVITY INSULATION. SEE ENERGY CALCULATION A060 & A061
B155	ROOF INSULATION, R-10 TAPERED FOAM + R-5 SPRAY INSULATION + R-25 BATH INSULATION. SEE ENERGY CALCULATION A060 & A061
B156	SUBDRAIN PIPE AND GRAVEL POCKET, SEE CIVIL DRAWINGS
B157	BELOW GRADE FOUNDATION WALL WATERPROOFING MNENBRANE + DRAINAGE BOARD, FROM 6" MIN BELOW FINISH FLOOR TO FINISH GRADE. SEE SPEC A991/1
B158	GRAVEL POCKET
B159	CONCRETE STAIRS ON GRADE - 7.75" MAX RISER & 10" MIN TREAD. 36" MIN. CLEAR WIDTH. SEE DETAILS AND FINISH SCHEDULE.

ROOF SCHEDULE		
TYPE	DESCRIPTION	THICK.
R01	COOL ROOF SINGLE PLY MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION, 2X12 ROOF RAFTERS, 5/8" GYP. BOARD	1' - 4 1/4"
R02	COMPOSITE WOOD DECK ON SLEEPERS, SINGLE PLY MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION,12" TJI ROOF RAFTERS, 5/8" GYP. BOARD	1' - 7 1/4"
R03	GREEN ROOF, WATERPROOFING MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION,12" LVL ROOF RAFTERS, 5/8" GYP. BOARD	1' - 7 3/4"

KEYNOTES SCHEDULE - SITE	
#	SITE PLAN KEYNOTES TEXT
S7	TRENCH DRAIN PER SPEC. SEE DETAILS.
S8	CONCRETE PAVERS DRIVEWAY,SOLAR REFLECTANCE OF AT LEAST 0.30. SEE ARCH DETAILS, AND FINISH SCHEDULE.
S24	WOOD DECK, PT WOOD FRAME ON CONCRETE PIERS. SEE DETAILS AND STRUCTURAL DRAWINGS
S25	RETAINING WALL. SEE DETAILS AND STRUCTURAL DRAWINGS
S40	POOL, SEE GREEN NOTE 14 SHT. A050
S41	SPA, SEE GREEN NOTE 14 SHT. A050
S43	PLANTER. PROVIDE WATERPROOFING & DRAINAGE. SEE DETAILS.

WALL SCHEDULE			
TYPE	DESCRIPTION	WIDTH	F.R.
C01	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE, SEE FINISH SCHEDULE FOR EXPOSED SIDE	8"	N/A
C02	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE + STUCCO FINISH ABOVE GRADE + 2x2 WOOD FURRING, R5 RIGID INSULATION & PAINTED 5/8" GYP. BD. INTERIOR LAYER	11 1/4"	
C03	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE + STUCCO FINISH ABOVE GRADE + 2x4 WOOD FURRING, R15 BATT INSULATION & 5/8" GYP. BD. INTERIOR LAYER + FINISH PER SCHEDULE	12 1/8"	N/A
W02	FC CLADDING + WRB + WD SHEATHING + 2x4 WD FRAMING , R21 BATT INSULATION + 5/8" GYP. BD. INTERIOR LAYER	8 1/8"	N/A
W04	STUCCO + WRB + WD SHEATHING + 2x6 WD FRAMING , R21 BATT INSULATION + 5/8" GYP. BD. INTERIOR LAYER + INTERIOR FINISH PER SCHEDULE	7 5/8"	
W05	FINISH PER SCHD'L + 5/8" GYP. BD. + 2X4 WOOD FRAMING + 5/8" GEP. BD. + FINISH PER SCHD'L	4 3/4"	N/A
W10	FINISH PER SCHD'L + 5/8" TYPE 'X' GYP. BD. + 2X6 WOOD FRAMING + 5/8" TYPE 'X' GEP. BD. + FINISH PER SCHD'L	8 1/2"	1HR



Source: Moura Design, 2024

Figure 3-6
Project Cross-Sections (East-West)

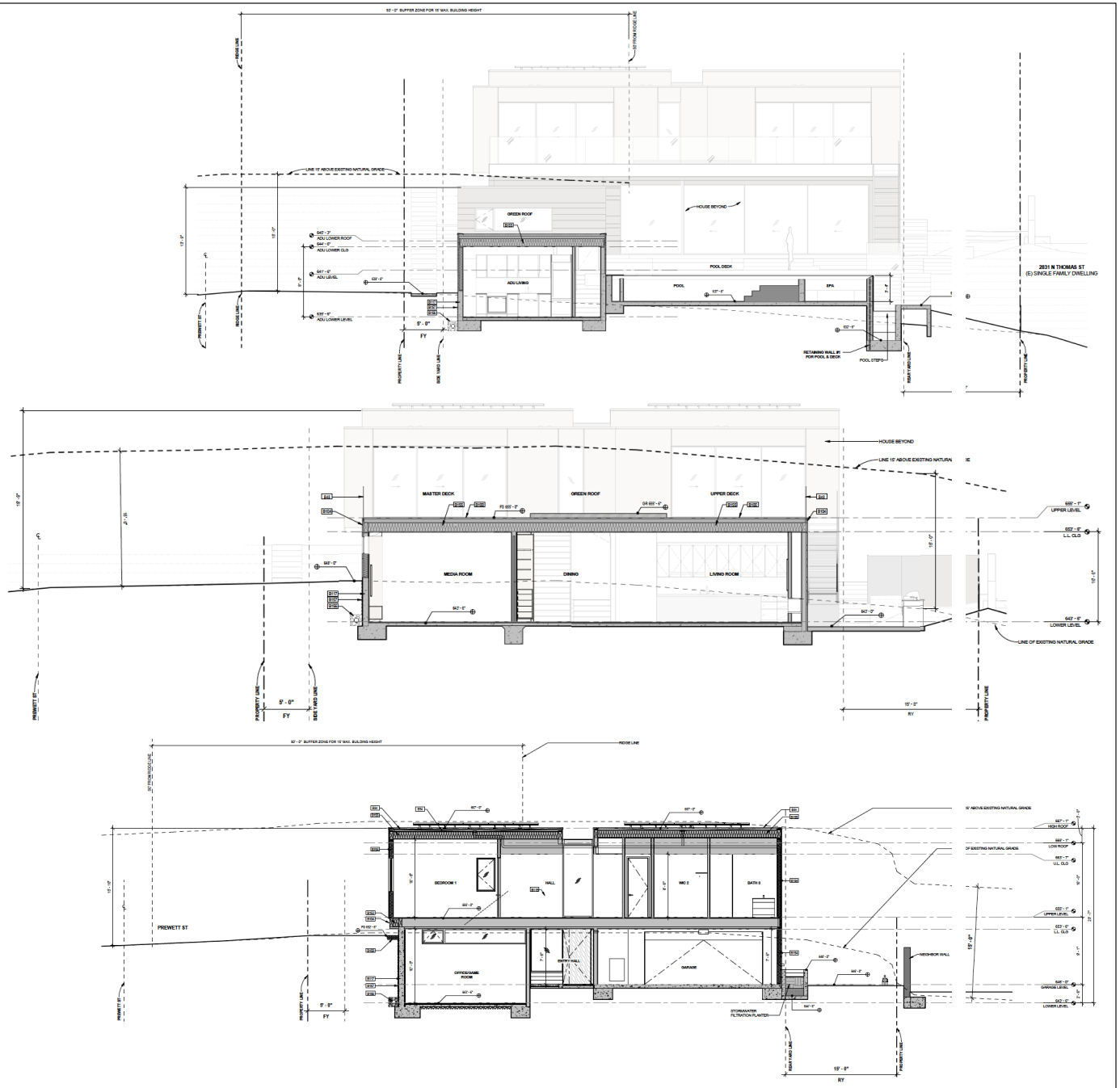
KEYNOTES SCHEDULE - SECTIONS	
#	BUILDING KEYNOTES TEXT
B28	GARAGE TO BE SEPARATED FROM HABITABLE ROOMS ABOVE BY 5/8" TYPE X GYPSUM BOARD OR EQUIVALENT (TABLE R302.6)
B29	DUCTS PENETRATING THE WALLS OR CEILINGS SEPARATING THE DWELLING FROM THE GARAGE SHALL BE CONSTRUCTED OF A MINIMUM NO. 26 GAGE SHEET STEEL OR OTHER APPROVED MATERIAL AND SHALL NOT HAVE OPENINGS INTO THE GARAGE (R302.5.2).
B32	GARAGE TO BE SEPARATED FROM DWELLING UNIT BY 1/2" GYPSUM BOARD MIN. (TABLE R302.6)
B45	STAIRS - 7.75" MAX RISER & 10" MIN TREAD. 36" MIN. CLEAR WIDTH. 6'-8" MIN. HEAD ROOM CLEARANCE. SEE DETAILS AND FINISH SCHEDULE.
B48	GLASS GAURDRAIL, CLEAR TEMPERED GLASS, 42" HIGH A.F.F. GUARDRAIL SHOE RECESSED INTO DECK. SEE DETAILS
B84	COOL ROOF MENBRANE PER SPEC. SEE DETAILS
B85	SOLAR PANEL SEE ENERGY CALCULATIONS
B94	ROOF DRAIN W/ CONCEALED DRAIN PIPE. CONNECT TO STORMWATER MITIGATION SYSTEM. SEE DETAILS

KEYNOTES SCHEDULE - SECTIONS	
#	BUILDING KEYNOTES TEXT
B100	WOOD DECK ON PT WOOD FRAMING. PROVIDE CROSS DRAINAGE UNDER FRAMING INTO FLOOR DRAIN. SEE FINISH SCHEDULE AND DETAILS.
B104	METAL FASCIA. SEE FINISH SCHEDULE AND DETAILS
B117	RETAINING WALL. SEE STRUCTURAL AND CIVIL DRAWINGS
B119	STAIRS - CLEAR TEMPERED GLASS GUARDRAIL WITH NICKEL SATIN COLOR ANODIZED ALUMINUM CAP. SEE DETAILS, FINISH SCHEDULE.
B153	OVERHANG INSULATION, R-19 BATH INSULATION. SEE ENERGY CALCULATION A060 & A061
B154	WALL INSULATION, R-21 BATH CAVITY INSULATION. SEE ENERGY CALCULATION A060 & A061
B155	ROOF INSULATION, R-10 TAPERED FOAM + R-5 SPRAY INSULATION + R-25 BATH INSULATION. SEE ENERGY CALCULATION A060 & A061
B156	SUBDRAIN PIPE AND GRAVEL POCKET, SEE CIVIL DRAWINGS
B157	BELOW GRADE FOUNDATION WALL WATERPROOFING MNENBRANE + DRAINAGE BOARD, FROM 6" MIN BELOW FINISH FLOOR TO FINISH GRADE. SEE SPEC A991/1
B158	GRAVEL POCKET
B159	CONCRETE STAIRS ON GRADE - 7.75" MAX RISER & 10" MIN TREAD. 36" MIN. CLEAR WIDTH. SEE DETAILS AND FINISH SCHEDULE.

ROOF SCHEDULE		
TYPE	DESCRIPTION	THICK
R01	COOL ROOF SINGLE PLY MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION, 2X12 ROOF RAFTERS, 5/8" GYP. BOARD	1' - 4 1/4"
R02	COMPOSITE WOOD DECK ON SLEEPERS, SINGLE PLY MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION, 12" TJI ROOF RAFTERS, 5/8" GYP. BOARD	1' - 7 1/4"
R03	GREEN ROOF, WATERPROOFING MENBRANE, SLOPED WOOD SUBSTRATE, STRUCTURAL DECK, R-5 CLOSED CELL SPRAY FOAM, R-25 BATH INSULATION, 12" LVL ROOF RAFTERS, 5/8" GYP. BOARD	1' - 7 3/4"

KEYNOTES SCHEDULE - SITE	
#	SITE PLAN KEYNOTES TEXT
S7	TRENCH DRAIN PER SPEC. SEE DETAILS.
S8	CONCRETE PAVERS DRIVEWAY,SOLAR REFLECTANCE OF AT LEAST 0.30. SEE ARCH DETAILS, AND FINISH SCHEDULE.
S24	WOOD DECK, PT WOOD FRAME ON CONCRETE PIERS. SEE DETAILS AND STRUCTURAL DRAWINGS
S25	RETAINING WALL. SEE DETAILS AND STRUCTURAL DRAWINGS
S40	POOL, SEE GREEN NOTE 14 SHT. A050
S41	SPA, SEE GREEN NOTE 14 SHT. A050
S43	PLANTER. PROVIDE WATERPROOFING & DRAINAGE. SEE DETAILS.

WALL SCHEDULE			
TYPE	DESCRIPTION	WIDTH	F.R.
C01	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE, SEE FINISH SCHEDULE FOR EXPOSED SIDE	8"	N/A
C02	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE + STUCCO FINISH ABOVE GRADE + 2x2 WOOD FURRING, R5 RIGID INSULATION & PAINTED 5/8" GYP. BD. INTERIOR LAYER	11 1/4"	
C03	CONCRETE RETAINING WALL + DRAINAGE & WATERPROOFING ON EXT. SIDE + STUCCO FINISH ABOVE GRADE + 2x4 WOOD FURRING, R15 BATT INSULATION & 5/8" GYP. BD. INTERIOR LAYER + FINISH PER SCHEDULE	12 1/8"	N/A
W02	FC CLADDING + WRB + WD SHEATHING + 2x4 WD FRAMING , R21 BATT INSULATION + 5/8" GYP. BD. INTERIOR LAYER	8 1/8"	N/A
W04	STUCCO + WRB + WD SHEATHING + 2x6 WD FRAMING , R21 BATT INSULATION + 5/8" GYP. BD. INTERIOR LAYER + INTERIOR FINISH PER SCHEDULE	7 5/8"	
W05	FINISH PER SCHD'L + 5/8" GYP. BD. + 2X4 WOOD FRAMING + 5/8" GEP. BD. + FINISH PER SCHD'L	4 3/4"	N/A
W10	FINISH PER SCHD'L + 5/8" TYPE 'X' GYP. BD. + 2X6 WOOD FRAMING + 5/8" TYPE 'X' GEP. BD. + FINISH PER SCHD'L	8 1/2"	1HR



Source: Moura Design, 2024

Figure 3-7
Project Cross-Sections (North-South)

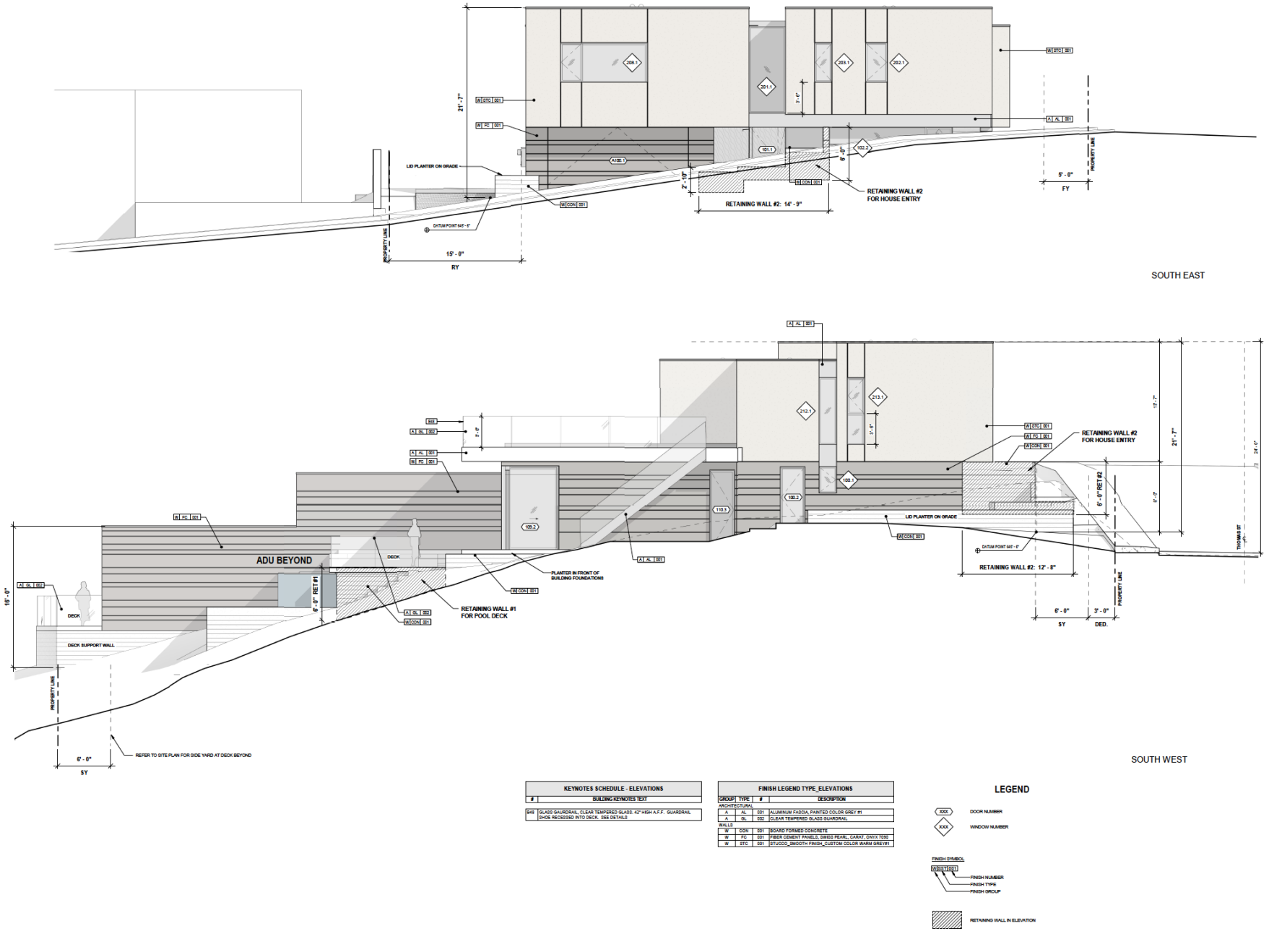
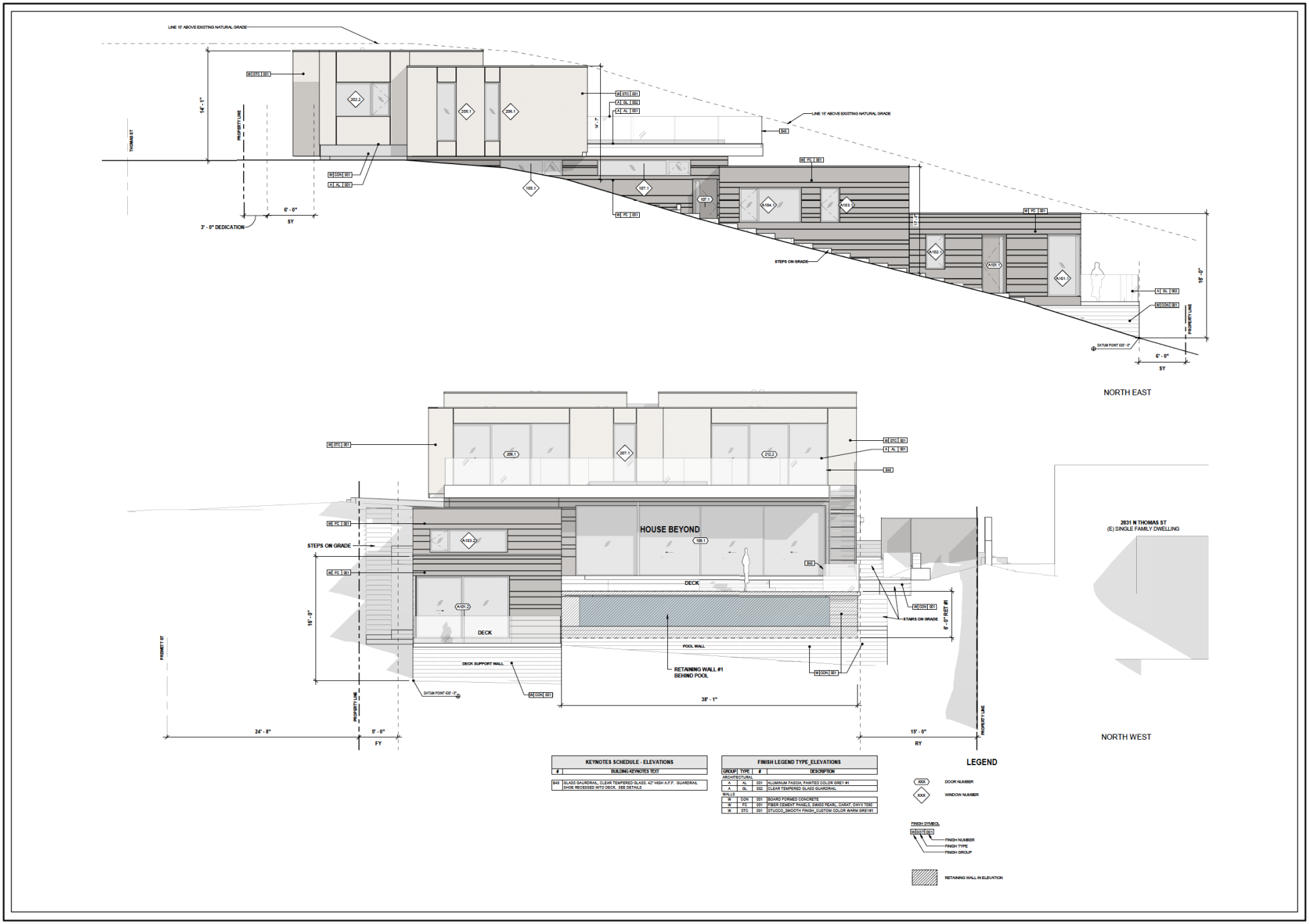


Figure 3-8
Project Elevations (Northeast and Northwest)



Source: Moura Design, 2021

Figure 3-9
Project Elevations (Southeast and Southwest)

Source: Moura Design, 2024

Figure 3-10
Project Renderings

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

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. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less than Significant Impact. A scenic vista refers to views of focal points or panoramic views of broader geographic areas that have visual interest. A focal point view would consist of a view of a notable object, building, or setting. An impact on a scenic vista would occur if the bulk or design of a building or development contrasts enough with a visually interesting view, so that the quality of the view is permanently affected.

The Project Site is subject to the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403) which identifies the Site as located along an identified ridgeline on the "Northeast LA Ridgelines" map. Residential parcels to the north of the Project Site at the base of the hill currently have views of this ridgeline. However, there are no publicly accessible or other protected vantage points with scenic views of the Project Site. The CA-110 Freeway is a designated scenic highway; however due to intervening topography and existing development, no views of the ridgeline, including the Project Site or the undeveloped hillside of Flat Top Hill are visible from CA-110. Furthermore, neither the undeveloped hillside nor the Project Site are

designated open space and there are no designated public vista points on or in the vicinity of the Site. As detailed below in response to **Checklist Question I(c)**, the Project would be consistent with the zoning for the Project Site and the regulations of the Northeast Los Angeles Community Plan and the Northeast Los Angeles Hillsides Zone Change Ordinance governing scenic quality as well as with the Landform Grading Manual, which seeks to assure that developments in the hillsides are visually compatible with the hillside. Although the Project would increase density on a currently vacant Site, the Project would develop a single-family residence and attached ADU consistent with surrounding land uses and would not be visually distinguishable from existing development when viewed from outside the neighborhood. As such, the Project would not have a substantial adverse effect on a scenic vista. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The Project Site is not located within or adjacent to a state or county scenic highway;[1] therefore, there is not potential for its implementation to damage scenic resources within a state scenic highway. No impact would occur and no mitigation is required.

Mitigation Measures

None required.

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

Less than Significant Impact. The Project Site is an urbanized area;[2] therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

Zoning Consistency

The Project Site is zoned [Q]R1-1D-HCR (Qualified One-Family Residential, Height District 1 with Development Limitations, Hillside Construction Regulation). Pursuant to LAMC Section 12.08.A, the R1 zone allows for single-family residences and ADUs. LAMC Section 12.08.C.4 requires every lot in the R1 zone to have a minimum width of 50 feet and a minimum area of 5,000 square feet. LAMC Section 12.21.C.10(b) limits the maximum RFA within hillside areas to lot-specific slope band analyses. LAMC Section 12.21.C.10(d) limits the maximum height of structures within the R1 zone and a 1D height limitation to 33 feet. However, due to the Site's location within 50

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[1] *California Department of Transportation, California Scenic Highway System Map, available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html, accessed December 28, 2023.*

[2] *California Code of Regulations, Title 14, Section 15387 defines "urbanized area" as a "central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile."*

feet of an identified ridgeline on the "Northeast LA Ridgelines" map, the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403) limits the height of buildings on the Project Site to under a 15-foot envelope parallel to the lowest adjacent finished grade. Pursuant to Table 12.21.C.10-1 of the LAMC, the Project Site is limited to: (1) a minimum front yard setback not less than 20 percent of the lot depth, which need not exceed 20 feet; (2) a side yard setback not less than five feet with one additional foot added to each required side yard for each increment of 10 feet or fraction thereof for buildings with a height greater than 18 feet; (3) and a minimum rear yard setback not less than 15 feet. LAMC Section 12.21.C.10(a)(2) further establishes a minimum setback of at least five feet for lots fronting Substandard Hillside Limited Street, such as the Project Site. LAMC Section 12.21.C.10(e) limits the lot coverage of buildings and structures of more than six feet over above the natural ground level in height to no more than 40 percent of the area of the lot.

As discussed in detail in response to **Checklist Question XI(b)**, the Project would be consistent with the scenic-quality-related zoning requirements and limits for the Project Site, including the land use, lot size, setback, lot coverage, height, and RFA established in Chapter I, the Planning and Zoning Code, LAMC Section 12.21.C(10), and the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403), as amended by ZI No. 2462 (Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations).

Other Scenic Quality Regulations

Community Plan

The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan. The Northeast Los Angeles Community Plan (Community Plan) is one of the 35 community plans that makes up the Land Use Element of the City of Los Angeles' General Plan. 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. The Community Plan includes goals, objectives, and policies related to residential development, some of which are related to scenic quality. The policies relevant to this analysis are the following:

- **Policy 1-1.1:** Protect existing stable single-family and other lower density residential neighborhoods from encroachment by higher density residential and other uses that are incompatible as to scale and character or would otherwise diminish the quality of life.
- **Policy 1-3.1:** Protect the quality and scale of the residential environment through attention to the appearance of new construction including site planning and compatible building design.
- **Policy 1-3.2:** Consider factors, such as neighborhood character and aesthetics, identity; compatibility of land uses; impacts on livability, services, public facilities, and traffic levels, when changes in residential densities are proposed.
- **Policy 1-5.4:** Require that any proposed development be designed to enhance and be compatible with adjacent development.

The Project would result in a single-family residential building with an attached Accessory Dwelling Unit on a currently vacant parcel, thus increased massing at the Site. However, the Project would be generally consistent with the viewshed of the surrounding area as the

surrounding area is also developed with single-family homes. The Project Site is zoned R1 for One-Family Residential and is surrounded by lots zoned RE and R1 for Residential Estate and One-Family Residential, respectively. The Project would develop a two-story, single-family residence consistent with the Site's current zoning and consistent with the low density zoning and one- to two-story, single-family development in the surrounding area. The Project residence has been designed with varied elevations to reflect the existing hillside topography. The existing neighborhood's residences are varied in style, character, and finishes and the Project's materials and color palette consists of those typical of residential land uses and would not stand out substantially from the surrounding land uses. Accordingly, the Project would be compatible in scale, character, design, and aesthetics, enhancing adjacent development. The design of the residence would not detract from the visual character or quality of the Site or surroundings.

Northeast Los Angeles Hillsides Zone Change Ordinance

The Project Site is subject to the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403). The requirements and limitations of the Ordinance No. 180,403 applicable to scenic resources focus on building design and landscaping, which are discussed below. Additional limitations of Ordinance No. 180,403 pertain to height and floor area and are discussed in Checklist **Section XI, Land Use and Planning**, of this IS/MND.

Building Design

Ordinance No. 180,403 requires: the use of 2nd story setbacks or terraced structures and other design articulations to ensure that new development is compatible with existing neighborhood identity, character, and scale; building materials that match the proposed architectural style; and front and rear building architectural design elements (e.g., articulation of facades; modulations of walls; shape, type, and locations of windows, doors, columns, balconies, and garage doors) that vary from adjacent or abutting buildings. Ordinance No. 180,403 also requires the design of new structures to meet one of the following standards: (1) the total RFA of each story other than the base floor shall not exceed more than 75 percent of the base floor area; (2) the cumulative length of the exterior walls facing the front lot line equal to a minimum of 25 percent of the building width shall be stepped-back a distance of at least 20 percent of the building depth from a plane parallel to the lot width established at the point of the building closest to the front lot line; or (3) three or more building elements with their own associated roof form. Due to the Site's location within 50 feet of an identified ridgeline on the "Northeast LA Ridgelines" map, Ordinance No. 180,403 further limits the height of buildings to under a 15-foot envelope parallel to the lowest adjacent finished grade. New hardscape areas are also required to utilize permeable pavers.

As previously shown on **Figure 3-6** through **Figure 3-9**, the proposed building design complies with the above limitations and requirements. The Project incorporates setbacks and an overall terraced design, articulations and modulations, and design elements that vary from the residential uses in the neighborhood, including the adjacent unfinished residence. As previously shown on **Figure 3-4**, Residential Floor Area, the 2nd floor area (1,533 square feet) would be approximately 64 percent of the base floor area (2,404 square feet). As previously shown on **Figure 3-6** through **Figure 3-9**, the height of the proposed residence would be within the 15-foot envelope above the natural grade and the maximum height. The Project also incorporates permeable pavers in the driveway and BBQ area. Project compliance with all building design requirements and limitations would be assured during final plan check as part of mandatory Project clearance with the Department of Public Works – Bureau of Street Services – Urban Forestry Division, the

Department of City Planning, and LADBS prior to the issuance of grading, foundation, or building permit.

Landscaping

Ordinance No. 180,403 requires drought tolerant and/or native plant materials that are fire retardant and control erosion and full screening of retaining walls and building understory areas. Ordinance No. 180,403 also requires submittal of Project Landscape Plans to the Bureau of Street Services, Urban Forestry Division and Department of City Planning for review and approval consistent with the requirements of LAMC Ordinance No. 177,404 (Protected Street Trees). The Project would be required to submit an Urban Forestry Division approval letter as part of the Project's development application and file a signed "Certified Arborist's or Licensed Landscape Architect's Certificate of Compliance" with the Department of Building and Safety ensuring that landscaping plans are fully implemented. Compliance with the plant material and screening requirements would be ensured during such reviews and approvals.

Summary

Based on the above, the Project would be consistent with the zoning for the Project Site and the regulations of the Northeast Los Angeles Community Plan and the Northeast Los Angeles Hillside Zone Change Ordinance. As such, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact.

Light

The Project Site is located in an urban, residential area of the City where there are low levels of ambient nighttime lighting, including street lights, vehicle headlights, and architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows). Night lighting for the Project would be provided to illuminate home entrances, walkways, and driveways and the proposed residence would include indoor building illumination. Therefore, implementation of the Project would increase the amount of light emanating from the currently vacant, unlit Site. However, the type and amount of lighting that the Project would include would be consistent with the existing residential land uses and would contribute to the overall lighting environment rather than being solely responsible for lighting impacts on a particular use. The Project's light source would not be noticeable visible compared to as compared to the existing light environment within the neighborhood. Furthermore, the Project would be required to comply with LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of

residential units from being illuminated by more than two foot-candles, or from receiving direct glare from the light source.[3]

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. Even so, the Project's compliance with the City's regulatory compliance measures, including LAMC Sections 12.21 A.5(k) and 93.0117, would require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, or from above so as to minimize light trespass. Therefore, the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area. Impacts would be less than significant and no mitigation measures would be required.

Glare

The Project would incorporate both solid and glass surfaces. Exterior building materials of the proposed building would use various non-reflective material designed to minimize the transmission of glare from the Project's building. Furthermore, the Project's compliance with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot-candles, or from receiving direct glare from the light source, would ensure potential glare impacts are not significant. Moreover, the Project does not propose to use polished metals in its design. As such, the Project would not create a new source of substantial glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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.

[3] *Direct glare, as used in LAMC Section 93.0117., is a glare resulting from high luminances or insufficiently shielded light sources that is in the field of view.*

	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?	☐	☐	☐	☒

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. According to surveys conducted pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, the Site and surrounding area are considered Urban and Built Up Land and is not considered Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land (Farmland).[4] Therefore, the Project would not convert existing Farmland to non-agricultural use. Accordingly, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, California Important Farmland Finder Interactive Map, available at: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed December 12, 2023.*

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

No Impact. The Project Site is [Q]R1-1D-HCR (Qualified One-Family Residential, Height District 1 with Development Limitations, Hillside Construction Regulation). Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, the Project Site is not under a Williamson Act contract. Accordingly, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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. In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space). The Project Site is zoned [Q]R1-1D-HCR (Qualified One-Family Residential, Height District 1 with Development Limitations, Hillside Construction Regulation) and no forest land exists on the Site. The City does not have specific zoning for timberland or timberland production, however, the Project Site is currently undeveloped and contains no trees,[5] including those utilized for timberland or timberland production uses. Accordingly, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. The Project Site is undeveloped and contains only annual weeds; no forest land was identified at the Project Site.[6] In addition, the surrounding vicinity is developed with single-family uses in an urban area of the City. Accordingly, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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[5] *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

[6] *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

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. The Project Site is located in an urban area of the City developed with single-family uses. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The Project would develop a new residential use at the Project Site consistent with the zoning and land use designation of the Site. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

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

Less than Significant Impact. The City, including the Project Site, is within the South Coast Air Basin (Basin), and the South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. The SCAQMD has responded to this requirement by preparing a series of air quality management plans (AQMPs). The most recent AQMP, the 2022 AQMP, identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in previous AQMPs have substantially decreased exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The 2022 AQMP control strategies were developed, in part, based on regional growth projections prepared by the Southern California Association of Governments (SCAG). Specifically, the 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). As the AQMP control strategy is based on projections from local general plans, projects which are consistent with local general plans are considered to be consistent with the growth assumptions of the air-quality-related regional plans and their emissions are assumed to be accounted for in the AQMP emissions inventory. Projects which include amendments to general or specific plans, or are considered significant projects, undergo further scrutiny for AQMP consistency.

As detailed further in **Section XI, Land Use and Planning**, of this IS/MND, the Project would be consistent with the City of Los Angeles General Plan including the Northeast Los Angeles Community Plan, the portion of the Land Use Element applicable to the Project Site. In addition, as detailed in **Section XIV, Population and Housing**, the Project would not exceed the growth projections of SCAG's 2020-2045 RTP/SCS. The Project does not propose and would not require amendments to the City's General Plan and is not subject to any specific plan. The Project proposes a single-family residence and attached ADU, which would not be considered a significant project pursuant to Title 14, Section 15206(b) of the California Code of Regulations, which establishes criteria for projects of statewide, regional, or areawide significance.[7] Because the Project would be consistent with the General Plan and the growth assumptions of the 2020-2045 RTP/SCS, it is assumed that the Project's emissions have been accounted for in the 2022 AQMP. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Criteria pollutants include Ozone (O_3), Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Respirable Particulate Matter (PM_{10} and $PM_{2.5}$), Sulfur Oxides (SO_x), and lead. Currently, the Basin is a nonattainment area for the federal standards for O_3 and $PM_{2.5}$ and the state standards for O_3, PM_{10}, and $PM_{2.5}$.[8] The Los Angeles County portion of the Basin is also designated nonattainment for the federal standard for lead. Sources of lead emissions are ore and metals processing (e.g., lead smelters, leaded aviation gasoline combustion), waste incinerators, lead-acid battery manufacturing, etc. The Project would not include any such sources of lead emissions. Therefore, implementation of the Project would not result in substantial

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7 *See Cal. Code of Regs. Tit. 14 Section 15206(b), available at: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-6-resources-agency/chapter-3-guidelines-for-implementation-of-the-california-environmental-quality-act/article-13-review-and-evaluation-of-eirs-and-negative-declarations/section-15206-projects-of-statewide-regional-or-areawide-significance, accessed January 17, 2024.*

8 *South Coast Air Quality Management District, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Basin, available at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14, accessed January 17, 2024.*

emissions of lead and this pollutant is not discussed further in this analysis. Because the Basin is designated as a federal and/or state nonattainment air basin for O_3, PM_{10}, and $PM_{2.5}$, and the Los Angeles County portion is designated as nonattainment for lead, there is an on-going regional cumulative impact associated with these criteria pollutants. However, an individual project can emit these pollutants without significantly contributing to this cumulative impact depending on the magnitude of emissions.

Construction of the Project would be expected to generate emissions of O_3 as a result of operation of off-road equipment and to generate emissions of PM_{10} and $PM_{2.5}$ as a result of fugitive dust created during earth-moving activities (i.e., grading, excavation, movement of off-road equipment over exposed soil). However, construction of a single-family residence and attached ADU would not require an unusually large number or sizes of off-road equipment and would not require concurrent operation of such machinery that would result in a substantial amount of maximum daily emissions. In addition, construction activities be required to comply with SCAQMD Rule 403 for the control of fugitive dust, which requires implementation of the best available dust control measures to prevent the generation of visible dust plumes. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, and cessation of construction activity when winds exceed 25 miles per hour.

Operation of the Project would be expected to generate emissions of O_3 as a result of: evaporation of solvents contained architectural coatings (e.g., paints, varnishes, primers, etc.); consumer products (e.g., detergents, cleaning compounds, polishes, personal care products, and lawn and garden products); operation of landscape maintenance equipment; combustion associated with the generation of energy sources; and vehicle trips to and from the Site by residents, service providers, and guests. Vehicle travel on paved roads would also generate emissions of PM_{10} and $PM_{2.5}$ as a result of particulates associated with tire wear and tear. However, air quality emissions associated with operation of a single-family residence and attached ADU would be minimal. Based on the size of the Project, it would not be expected that an exceedingly large amount of architectural coatings or number of consumer products or landscape equipment would be operated at the Site. In addition, the Project would be required to adhere to the requirements of SCAQMD Rule 1113, which limits paints and other coatings to low-VOC (50 g/L for non-flat residential coatings and 100 g/L for non-residential coatings and street striping). The Project would not be permitted to install wood-burning fireplaces (pursuant to SCAQMD Rule 445). Consistent with the requirements of LAMC Section 99.04.106.8 (added by City Ordinance No. 187,714), the Project would not include natural gas as an energy source and because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the Basin, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance. As detailed in **Section XVII, Transportation**, the Project would generate 20 daily vehicle trips, which would not contribute significantly to emissions of O_3 associated with combustion of transportation-related fuel or of PM_{10} and $PM_{2.5}$ associated with tire wear and tear. SCAQMD Rule 403 also requires establishment of a permanent, stabilizing ground cover on finished sites to reduce emissions of PM_{10} and $PM_{2.5}$ associated with fugitive dust during operation.

Based on the above, the potential air emissions that would be generated by construction and operation of the Project would be minimal and would not exceed SCAQMD regional operational emissions thresholds. Therefore, the Project would not 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. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. 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. The sensitive receptors in the vicinity of the Project Site are residential land uses. The single-family and use immediately adjacent to the Project Site is vacant and abandoned; therefore, the closest sensitive receptors to the Site are the residential land uses located north of Two Tree Avenue; the residential land uses located south of Two Tree Avenue; the residential land uses located east of the intersection of Two Tree Avenue and N. Thomas Street; and the residential land uses located north and south of the intersection of Two Tree Avenue and N. Prewett Street.

As discussed above, due to the small-scale construction and operational activities associated with the Project, the Project would not generate substantial concentrations of pollutants. The Project would be required to adhere to existing SCAQMD rules and LAMC requirements designed to limit air quality emissions and prevent exceedances of air quality standards. Furthermore, the Project would not include stationary sources or attract mobile sources (such as heavy duty trucks) that would spend long periods queuing or idling at the Site (e.g., industrial warehouses or transfer facilities).

With regard to toxic air contaminants (TACs), according to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 12 months, construction of the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Operation of the Project would involve typical residential activities, which are not associated with emissions of substantial TAC concentrations. In order to determine if there are existing sources of TACs that may impact the Project Site's proposed residential use, potential sources of TACs were identified using the SCAQMD's Facility Information Detail (FIND) map search. No TAC sources were identified within 0.25-mile of the Project Site.[9] In addition, the Project Site is located

[9] *South Coast Air Quality Management District, Facility Information Detail, Facility Map, available at: https://www.aqmd.gov/nav/FIND/facility-information-detail, accessed January 17, 2024.*

outside of the 500-foot minimum siting distance from freeways recommended by the California Air Resources Board (CARB) and the SCAQMD; the Project Site is located over 3,000 feet from the CA-110 freeway and over 4,000 feet from the I-5 freeway. As such, the Project would not locate sensitive receptors within the vicinity of sources of substantial TACs.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would involve the construction and operation of residential homes, which are not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, impacts related to odors during construction would not be significant. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis of the potential biological resources impacts of the Project is based, in part, on the information contained within the Protected Tree Survey Letter[10] prepared for the Project by Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A) on March 29, 2021, included as **Appendix B**, to this IS/MND.

[10] *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

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. The Project Site and the undeveloped hillside to the north/northeast are designated as OpenSpace/Habitat by the City.[11] However, the Project Site is vacant and undeveloped and contains only annual weeds.[12] Accordingly, implementation of the Project would not have the potential to result in an adverse effect on candidate, sensitive, or special status plant species. Based on the lack of vegetative habitat on the Project Site, it is unlikely that any special status species listed by the California Department of Fish and Wildlife (CDFW) or by the U.S. Fish and Wildlife Service (USFW) would be present onsite. Therefore, the Project would not have the potential to result in an adverse effect on candidate, sensitive, or special status plant species.

While common bird species are not considered special-status, under the provisions of the MBTA, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by the USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest, or egg of any migratory bird covered by the conventions, or to attempt those activities. In addition, the CFGC extends protection to non-migratory birds identified as resident game birds (CFGC Section 3500) and any birds in the orders Falconiformes or Strigiformes (birds-of-prey) (CFGC Section 3503.5). However, due to the lack of shrubs or trees at the Project Site, no habitat with the potential to support nesting birds is located onsite. Therefore, implementation of the Project would not adversely affect raptors or nesting birds.

Based on the above, the Project would not have a substantial adverse effect 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. Therefore, impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. The Project Site and the undeveloped hillside to the north/northeast are designated

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[11] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B—Biological Resources Areas (Metro Geographical Area).*

[12] *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

as OpenSpace/Habitat by the City.[13] However, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[14,15] In addition, the Project Site is not located within or adjacent to any County of Los Angeles Significant Ecological Areas.[16] Therefore, implementation of the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impacts would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. No wetlands, including marshes, vernal pools, or coastal areas are located on or in the vicinity of the Project Site.[17] As such, the Project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impacts would occur and no mitigation would be required.

Mitigation Measures

None required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. The Project Site is not located within a Regional Wildlife Linkage, Essential Connectivity Area, or other formally recognized wildlife movement corridor. The City of Los Angeles' CEQA Thresholds Guide suggests potential significance if a project site is immediately adjacent to an undeveloped natural open space containing native vegetation that appears to serve as a buffer between existing development and habitat and is potentially part of a movement corridor or habitat linkage system. The Project Site and the undeveloped hillside to the north/northeast are designated as OpenSpace/Habitat by the City.[18] However, this open space is

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13 *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B—Biological Resources Areas (Metro Geographical Area).*

14 *City of Los Angeles, Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5208-015-001 and 5208-015-002, http://zimas.lacity.org, accessed December 12, 2023.*

15 *United States Fish and Wildlife Service, National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed December 12, 2023.*

16 *County of Los Angeles, Department of Regional Planning, Planning & Zoning Information for Unincorporated L.A. County, GIS-NET Public, https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed December 12, 2023.*

17 *United States Fish and Wildlife Service, National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, accessed December 12, 2023.*

18 *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B—Biological Resources Areas (Metro Geographical Area).*

entirely surrounded by developments and no connectivity with any other open space or habitat exists. Accordingly, the Project Site and vicinity do not serve as a movement corridor. Additionally, there are no waterways in the surrounding vicinity that could be utilized by migratory fish. Furthermore, the Project Site is vacant and undeveloped and contains only annual weeds,[19] and suitable habitat, including shrubs or trees, for nesting birds or other wildlife nurseries is not present. Accordingly, the Project would not be expected to significantly fragment existing natural lands as it pertains to wildlife movement. As such, the Project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeded the use of native wildlife nursery sites. No impacts would occur and no mitigation would be required.

Mitigation Measures

None required.

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

No Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186,873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all protected trees or shrubs. In addition, a Bureau of Street Trees, Urban Forestry Division permit is required to plant, remove, destroy, cut, prune, or deface any tree, shrub, or plant in any street in the City. The Project Site is vacant and undeveloped and contains only annual weeds.[20] No trees or shrubs exist and the Project does not propose and would not require the removal of any onsite or offsite trees or shrubs, including protected species.

Mitigation Measures

None required.

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

No Impact. The Project Site is not located within the boundaries of a Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[21,22] Accordingly, the Project would not conflict with such plans. No impacts would occur and no mitigation would be required.

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19 *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

20 *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

21 *California Department of Fish and Wildlife, California Natural Community Conservation Plans Map, August 2023, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed December 15, 2023.*

22 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org, accessed December 15, 2023.*

Mitigation Measures

None required.

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?	☐	☐	☒	☐

The following analysis of potential cultural resources impacts of the Project is based, in part, on a search of the South Central Coastal Information Center (SCCIC)'s California Historical Resources Information System (CHRIS).[23] The results of the search are included as **Appendix C** to this IS/MND.

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

No Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

[23] *South Central Coastal Information Center, California Historical Resources Information System, Records Search Results for 2824-2830 N. Prewett Street, Los Angeles, SCCIC File#: 25612.11692, February 15, 2024.*

The Project Site is vacant and undeveloped and has not been designated or identified as eligible or potentially eligible for designation as an historic resource, including as an Historic-Cultural Monument.[24] The Project Site is also not located within an Historic Preservation Overlay Zone. [25] A review of the California Historical Resources Information System (CHRIS) database did not identify any previously recorded cultural resources at the Project Site.[26] Accordingly, the Project would not cause a substantial adverse change in the significance of an historical resource. Therefore, no impacts to historical resources would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources.

Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[27] In addition, results of the CHRIS search were negative for onsite archaeological resources.[28] However, the SCCIC states that "[w]hile there are currently no recorded archaeological sites within the [P]roject area, buried resources could potentially be discovered during [P]roject activities." The Project Site is undeveloped and, thus, there is potential for the inadvertent discovery of unknown archaeological resources during development of the Project. The SCCIC recommends that "customary caution and a halt-work condition should be in place for all ground-disturbing activities. Accordingly, pursuant to standard conditions of approval for grading permits, the Department of City Planning and Building and Safety requires adherence to regulatory compliance measures and procedures related to the incidental discovery of archaeological resources discovered during construction. If archaeological resources are discovered during surface grading or construction activities, work is required to cease in the area of the find until a qualified archaeologist has evaluated the find and treated it in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project are prohibited from collecting or moving any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. The Project's mandatory adherence to this standard condition of approval would ensure that if any

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[24] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, available at: http://www.historicplacesla.org/map, accessed December 15, 2023.*

[25] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org, accessed December 15, 2023.*

[26] *South Central Coastal Information Center, California Historical Resources Information System, Records Search Results for 2824-2830 N. Prewett Street, Los Angeles, SCCIC File#: 25612.11692, February 15, 2024.*

[27] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.*

[28] *South Central Coastal Information Center, California Historical Resources Information System, Records Search Results for 2824-2830 N. Prewett Street, Los Angeles, SCCIC File#: 25612.11692, February 15, 2024.*

archaeological resources are encountered during construction, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. Should human remains be encountered unexpectedly during grading or construction activities, California 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 Public Resources Code Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resource Code Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant and no mitigation measures are required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

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.

Construction

Petroleum-based fuels, such as gasoline and diesel, would be the primary sources of energy for the Project's construction activities. This is because construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which have a minimal electrical demand and would be turned off when not in use to avoid unnecessary consumption. Additionally, the use of electricity during construction would be temporary and is typically a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Petroleum-based fuels would be required to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site.

Consumption of transportation fuel during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and the contractor would be required to comply with the California Air Resource Board (CARB)'s In-Use Off-Road Diesel Fueled Fleets Regulation that restricts the idling of heavy-duty diesel motor vehicles and governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, construction schedules and processes are already designed to be efficient in order to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it.

Operation

Electricity and Natural Gas

The Project would be required to comply with LAMC Section 99.04.106.8 (added by City Ordinance No. 187,714), which requires all newly constructed building to be all-electric buildings. As such, operation of the Project would not include connection to supplies of natural gas or result in demand for natural gas. All Project systems, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances would be powered by electricity provided by LADWP. LADWP projects that its total annual sales for each year of the current planning period (through fiscal year 2044-2045) will exceed 20,000 GWh.[29] There are no unusual features of the Project or the Site that would result in a single-family residential land use

[29] *Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1. 2021 Load Forecast, Page A-7.*

representing more than an extremely negligible portion of the electrical consumption LADWP anticipates and has planned supplies for within its service area.

Through the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC), the Project would be required to comply with all standards set in the California Building Code (CBC) Title 24 and Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) applicable to single-family residential land uses. The 2022 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. Mandatory measures for single-family residences include standards for building envelopes, HVAC systems, water heating, indoor and outdoor lighting, pool and spa systems, solar-ready buildings, and electric-ready buildings. California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Mandatory measures for single-family residences include standards for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. The City's Green Building Code further establishes mandatory measures related to heat island effect reduction, ENERGY STAR compliant equipment, and HVAC system size and design, which exceed statewide Title 24 requirements.

Furthermore, the Project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with state requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to vehicle trips to and from the Project Site by residents and visitors. As with electricity, there are no unusual features of the Project or the Site that would result in a single-family residential land use representing more than an extremely negligible portion of the transportation-related energy consumption in the County.

Over the lifetime of the Project, the fuel efficiency of vehicles is expected to increase as a result of numerous regulations in place that require and encourage increased fuel efficiency, such as efforts to accelerate the number of plug-in hybrids and zero-emissions vehicles in California, and increasingly stringent emissions standards. As a result, the amount of petroleum consumed as a result of vehicular trips to and from the Project Site during operation would be expected to correspondingly decrease over time due to improvements in the fuel economies of the fleet of vehicles used to access the Project. Additionally, as detailed in response to **Checklist Section XVII, Transportation**, the Project would not conflict with circulation system plans, including those pertaining to alternative modes of transportation. Specifically, the Project would be required to comply with the applicable standards of CALGreen and the City's Green Building Code, which contain requirements for the installation of electric vehicle charging infrastructure, which promotes the use of alternative fuels for transportation.

Summary

Based on the above, although the Project would increase energy use at the Project Site, the electrical and petroleum-based fuel demands would be a small fraction of projected demands within the LADWP service area and Los Angeles County, respectively; and, due to efficiency increases, are expected to diminish over time (particularly with respect to petroleum). As such, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in California Code of Regulations (CCR) Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every three years to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The new 2022 standards became effect on January 1, 2023. The Project would be required to meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency through compliance with the LAMC, which contains measures that meet or exceed the statewide standards, and are ensured during City of Los Angeles Department of Building and Safety (LADBS) plan check as part of the normal building permit process.

The Project would also be subject to the policies set forth in SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) at the regional level. SCAG's 2020 Connect SoCal is the most recent update to their RTP/SCS and is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region pursuant to Senate Bill (SB) 375. With regard to individual developments, such as the Project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. Connect SoCal's goal is to actively encourage and create incentives for energy efficiency, where possible. As previously discussed, the Project would follow applicable energy standards and regulations with regard to efficiency during construction and would be built and operated in accordance with all applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time of construction. Consistent with LAMC requirements, the Project would include electric vehicle infrastructure and solar panels, in support of alternative modes of transportation and renewable energy sources. In addition, the Project's development in proximity to existing transit would be consistent with the goals of Connect SoCal.

Based on the above, the Project would implement features and systems designed to reduce the consumption of energy and has been located consistent with policies designed to reduce VMT. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis of potential geology and soils impacts of the Project is based, in part, on the Geologic and Geotechnical Engineering Report (Geotechnical Report) prepared for the Project by GeoSoils Consultants, Inc. in April 2021;[30] and the Geotechnical Report's Approval Letter issued by LADBS in May 2021.[31] The Geotechnical Report and the Approval Letter are included as **Appendix D.1** and **Appendix D.2**, respectively, to this IS/MND and their findings, conclusions, and recommendations are incorporated by reference herein.

The following analysis of potential impacts to paleontological resources is based, in part, on a search of the paleontological collection records of the Natural History Museum of Los Angeles County conducted for the Project area. The results of the records search are included as **Appendix E** to this IS/MND.

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

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

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

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a Preliminary Fault Rupture Zone.[32] There are several Alquist-Priolo Earthquake Fault Zones in the Los Angeles region; the nearest Alquist-Priolo Earthquake Fault Zone to the Project Site is located approximately 2.7 miles north of the Project Site and is associated with the Raymond

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30 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021.*

31 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021.*

32 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

Fault.[33] Because no known faults cross the property, the potential for ground rupture at the Project Site is considered remote.[34]

The Project would involve the development of a single-family residence and an attached ADU and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for fault rupture. As such, the Project would not cause substantial adverse effects involving rupture of a known fault. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. There are numerous active faults in the region; as discussed above, the nearest active fault with a surface trace is the Raymond Fault, which is an approximately 16-mile long fault running west to east from south of the community of Eagle Rock to South Pasadena. In addition, several buried thrust faults (those faults without a surface expression) underlie the Los Angeles Basin and San Fernando Valley and are capable of generating significant ground shaking in the Los Angeles Area, including at the Project Site.

However, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its Seismic Design Category as established in the Geotechnical Report that has been reviewed and approved by LADBS. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code and the Project's Geotechnical Report contains recommendations for earthquake resistant structural design. Provided that all recommendations contained within the Geotechnical Report are incorporated into the final design and construction of the Project, the Geotechnical Report concluded that the Project is feasible from a geotechnical engineering perspective.[35] LADBS concluded that the Geotechnical Report is acceptable provided that their conditions are complied with during development.[36] Prior to issuance of a grading permit, the Project would be required by LAMC Section 91.7006 to incorporate all recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their Approval Letter,

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[33] *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed December 19, 2023.*

[34] *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 5.*

[35] *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 7.*

[36] *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021, page 1.*

which would account for seismic calculations from probabilistic seismic hazard modeling for the Site.

The potential seismic shaking hazard to the Project Site would not be higher than in most areas of the City or elsewhere in the region. The development of single-family residential buildings is an expected use typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust or otherwise have the potential to directly or indirectly exacerbate existing potential for. As such, the Project would not cause substantial adverse effects involving seismic ground shaking. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the Site.

The Project Site is not mapped within an area where historic occurrences of liquefaction or geological, geotechnical, and groundwater conditions indicate a potential for liquefaction to occur according to the California Geological Survey.[37] As such, the Geotechnical Report concluded that liquefaction is not considered a hazard to the Project Site.[38] Accordingly, the Geotechnical Report concluded that the Project is feasible from a geotechnical engineering perspective, provided that all recommendations contained within the Geotechnical Report are incorporated into the final design and construction of the Project;[39] and LADBS concluded that the Geotechnical Report is acceptable provided that their conditions are complied with during development.[40] Prior to issuance of a grading permit, the Project would be required by LAMC Section 91.7006 to incorporate all recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their Approval Letter,

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37 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed December 19, 2023.*

38 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 6.*

39 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 7.*

40 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021, page 1.*

which would ensure that the Project would not cause substantial adverse effects involving seismic-related ground failure. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

iv. Landslides?

Less than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rock on steep sloping terrain. The Project Site is located at the top of steeply-sloping hillsides. However, the Project Site is not mapped as potentially susceptible to seismically-induced landslides,[41] and no active or dormant landslides, including debris flows or rock slides, are known to exist on or adjacent to the Site.[42]

Furthermore, the Project's Geotechnical Report contains Site- and Project-specific design requirements for appropriate cut and fill slopes, excavation characteristics, slope clearance, retaining walls, and general design which has been reviewed and approved with conditions by LADBS. Geotechnical Report concluded that the Project is feasible from a geotechnical engineering perspective, provided that all recommendations contained within the Geotechnical Report are incorporated into the final design and construction of the Project;[43] and LADBS concluded that the Geotechnical Report is acceptable provided that their conditions are complied with during development.[44] Prior to issuance of a grading permit, the Project would be required by LAMC Section 91.7006 to incorporate all recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their Approval Letter, which would account for kinematic and slope stability analyses for the Site. As such, the Project would not cause substantial adverse effects involving landslides. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Grading and earthwork activities during construction would expose soils to potential short-term erosion by wind and water. During construction, the Project would be required to comply with erosion and siltation control measures such as sand- bagging to reduce site runoff or hold topsoil in place prior to final grading and construction. The Project would be required to comply with CALGreen Section 5.106, which requires newly constructed projects which disturb less than one acre of land to prevent stormwater runoff pollution through

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41 *California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed December 19, 2023.*

42 *California Department of Conservation, California Geological Survey, Landslide Inventory Map, available at: https://maps.conservation.ca.gov/cgs/lsi/, accessed December 19, 2023.*

43 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 7.*

44 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021, page 1.*

compliance with local ordinances and implementation of Best Management Practices (BMPs). BMPs include drainage swales or lined ditches to control stormwater flow, scheduling construction during dry weather, sediment trips or basins to retain sediments on site, and hydroseeding to stabilize disturbed soils. These BMPs would be detailed in an ESCP, which must be acceptable to the City and in compliance with NPDES standards.

The Project would also be subject to the erosion control system requirements of LAMC Section 91.7007.1, which limits the amount and timing of grading during the rainy season (defined as between October 1 and April 15). Additionally, all grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion impacts to acceptable levels. Compliance with LAMC Division 70 (Grading, Excavations and Fills), which contains specific requirements for erosion control and drainage devices, would also reduce any soil erosion from the Site. During the Project's construction phase, the Project would also be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and waterborne erosion at the Site. As such, compliance with City and State regulatory requirements would minimize erosion potential to a less than significant level; no mitigation would be required.

Mitigation Measures

None required.

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. Potential impacts with respect to liquefaction and landslide potential are evaluated in **Checklist Questions VI(a.iii) and (a.iv)** above. As detailed above, the Project would not result in landslide or liquefaction. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is not identified as being located in an oil field or within an oil drilling area. Additionally, the Project itself does not propose direct withdrawal or injection of fluid into the subsurface soils beneath the Site. Furthermore, as previously discussed, compliance with the City Building Code includes incorporation of the Site- and Project-specific design requirements for soil stability established in the Geotechnical Report that has been reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendation of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their Approval Letter, which would account for slope stability at the Site. The steepness of all new graded slopes would be confirmed during professional inspection and certification by the Project's civil engineer, soils engineer, and engineering geologist as outlined in LAMC Section 91.7008.[45] Following inspection, LAMC Section 91.7008 requires that: the Project's civil engineer submits an as-graded plan showing pertinent information

[45] *See Checklist Section VII, Geology and Soils, of this IS/MND for additional analysis of grading and the Site's geologic conditions.*

regarding the as-graded condition; the soils engineer submits a final report detailing the observations, testing, and inspections conducted verifying that grading has been conducted in accordance with the Project's approved grading plans and with the appropriate requirements of the LAMC; the engineering geologist submits periodic in-grading inspection reports and a final geologic report certifying that the Site's graded condition is geologically suitable and safe for construction; and the grading contractor submits a statement of conformance to as-built plan specifications. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. Based on expansion index testing of the soils at the Project Site, the Geotechnical Report found that the surficial soils, which were encountered to depths of up to four feet below the existing grade, have a medium expansion potential.[46] However, based on grading plans and recommendations of the Geotechnical Report, the proposed residence and ADU would be founded on bedrock of the Puente Formation, which was determined to be suitable for structural support.[47] As discussed above, the Geotechnical Report concluded that the Project is feasible from a geotechnical engineering perspective, provided that all recommendations contained within the Geotechnical Report, including recommendations for foundations design, are incorporated into the final design and construction of the Project; [48] and LADBS concluded that the Geotechnical Report is acceptable provided that their conditions are complied with during development.[49] Prior to issuance of a grading permit, the Project would be required by LAMC Section 91.7006 to incorporate all recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their Approval Letter, which would ensure that the Project would not create substantial direct or indirect risks to life or property as a result of expansive soils. Therefore, impacts would be less than significant and no mitigation measures would be necessary.

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46 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 3.*

47 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 3.*

48 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 7.*

49 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021, page 1.*

Mitigation Measures

None required.

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. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. According to a search of the paleontology collection records of the Natural History Museum of Los Angeles County, there are no known fossil localities that lie directly within the Project area.[50] In addition, no known paleontological resources are mapped by the City as within the Project Site.[51] However, the Project Site and surroundings are within an area identified as having surface sediments with unknown fossils potential,[52] and fossil localities are located nearby from the same sedimentary deposits that may occur in the Project Area.[53] In addition, the Project Site is undeveloped and has not been previously disturbed. As such, there is a potential for previously unknown paleontological resources to be present in the subsurface materials at the Project Site. However, the Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources should they be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources." [54] Pursuant to the requirement of the Conservation Element, the City has established the following standard condition of approval related to paleontological resources: in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment

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50 *Natural History Museum of Los Angeles County, Research & Collections, Paleontological resources for the 2824-2830 N. Prewett Street Project, December 24, 2023.*

51 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, page 2.15-4.*

52 *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles, page 2.15-5.*

53 *Natural History Museum of Los Angeles County, Research & Collections, Paleontological resources for the 2824-2830 N. Prewett Street Project, December 24, 2023.*

54 *City of Los Angeles, General Plan, Conservation Element, Adopted September 26, 2001, page II-5.*

shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. As such, the Project would not destroy a unique paleontological resource or site or unique geologic feature. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The analysis of GHG emissions is different from the analysis of criteria pollutants. For criteria pollutants, significance thresholds have been established by SCAQMD based on ambient air quality standards. For GHG emissions, however, no significance thresholds have been established by the state, SCAQMD, or the City of Los Angeles. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on whether the Project is not in conflict with, and therefore is consistent with, statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment consistent with CEQA Guidelines Section 15064.4 and CEQA Guidelines Appendix G. Specifically, the following analysis evaluates the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB's 2022 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code.

CARB's 2022 Climate Change Scoping Plan

The state has established three priority areas (transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization) for local jurisdictions to focus on when taking meaningful climate action. To assist local jurisdictions, the 2022 Scoping Plan Update presents a

list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas.

Transportation Electrification

The GHG reduction strategies related to transportation electrification include converting local government fleets to zero-emission vehicles (ZEV) and creating a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide. Consistent with the 2022 Scoping Plan's goals of transitioning to ZEVs, the City of LA Green New Deal identifies a number of goals to convert the municipal fleet to ZEV and install electric vehicle (EV) chargers throughout the City. Although these strategies apply to City fleets, the Project would not conflict with these goals and would install a raceway located, sized, and identified/reserved for future EV charging pursuant to Los Angeles Municipal Code (LAMC) Section 99.4.106.4.2.

VMT Reduction

The GHG reduction strategies related to VMT reduction include reduction/elimination of minimum parking standards in new developments; implementation of parking pricing or transportation demand management pricing strategies; implementation of Complete Streets policies and investments consistent with general plan circulation element requirements; increasing access to public transit; increasing public access to clean mobility options; amending zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development; and preservation of natural and working lands. Consistent with these strategies, the City of Los Angeles Mobility Plan 2035 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 0.5-mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips. As detailed in **Section XVII, Transportation**, of this IS/MND, the Project would not conflict with the policies of the Mobility Plan 2035, including those pertaining to parking management.

With regard to Complete Streets policies and investments, the Mobility Plan 2035 also 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 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; and establishes guidelines for establishing on-street parking for car sharing. The City has also established Blue LA, which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. This reduction strategy mainly applies to City traffic circulation. However, the Project would support Complete Streets through consistency with the Mobility Plan 2035 (as detailed in **Section XVII, Transportation**, of this IS/MND). Additionally, the Project Site is located approximately 0.4-mile north of the Broadway & Thomas bus stop for Los Angeles County Metropolitan Transportation Authority ("Metro") Line 182 service with stops approximately every 30 minutes during weekdays and weekends/holidays and for Metro Line 45 service with stops approximately every 10 minutes during weekdays and weekends/holidays, which would enable the use of public transit.

The remaining strategies for increasing access to public transit and clean mobility options and those related to land use 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. 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. Locally, the Complete Streets Design Guide also provides a number of reduction strategies to increase public access to electric shuttles, car sharing, and walking; continues to build out networks for pedestrians, bicyclists, and transit users; has implemented an EV car sharing network; and is working towards increasing publicly available chargers and introducing new electric DASH buses. These reduction strategies mainly apply to increasing Citywide access to and use of public transit and clean mobility options; however, the Project would not conflict with the City's ability to implement such strategies. As detailed further below, the Project would be consistent with the 2020-2045 RTP/SCS. As detailed in **Section XVII, Transportation**, of this IS/MND, the Project would not conflict with the policies of the Mobility Plan 2035, including those pertaining to multimodal access.

Building Decarbonization

The GHG reduction strategies for local government climate action related to building decarbonization include adoption of all-electric new construction codes; and adoption of policies and incentive programs to implement energy efficiency retrofits for existing buildings. 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. Locally, the City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-electric, which will reduce GHG emissions related to natural gas combustion. The Project Site does not contain existing buildings; however, the Project would support Citywide efforts for building decarbonization through construction and operation of an all-electric building consistent with LAMC Section 99.04.106.8.

SCAG's 2020-2045 RTP/SCS

At the regional level, the 2020-2045 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. The 2020-2045 RTP/SCS recognizes that the transportation sector is the largest contributor to the State's GHG emissions. The purpose of the 2020-2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. To accomplish this goal, the 2020-2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020-2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020-2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT, (2) increased use of alternative fuel vehicles, and (3) improved energy efficiency.

As detailed in **Section XVII, Transportation**, of this IS/MND, the Project would generate 20 daily vehicle trips, which is far below the 250-daily-trip threshold for VMT analysis established in the City's Transportation Assessment Guidelines. In addition, pursuant to Los Angeles Municipal Code (LAMC) Section 99.4.106.4.2, the Project would install a raceway located, sized, and identified/reserved for future EV charging in support of alternative fuel vehicles.

City of Los Angeles Green New Deal

The City's Green New Deal includes both short-term and long-term aspirations through the year 2050 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.

While not a plan adopted solely to reduce GHG emissions, within the City's Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. Although the Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote the Green New Deal's goals. Such reductions include installation of a raceway located, sized, and identified/reserved for future electric vehicle (EV) charging pursuant to Los Angeles Municipal Code (LAMC) Section 99.4.106.4.2; construction of a solar-ready residence; construction of an all-electric building consistent with LAMC Section 99.04.106.8; incorporation of eco-friendly and recycled building materials, systems, and features wherever feasible, including energy efficient appliances, water saving/low-flow fixtures, green roofs, permeable pavers, non-volatile organic compound paints/adhesives, drought-tolerant planting, weather- or soil-based automatic irrigation system controllers, and a high-performance building envelopment; and adherence to all City Building Code and Title 24 energy efficiency standards. The Project would also be located approximately 0.4-mile of an existing transit stop and would not conflict with the GHG emission reducing and land use policies of the Mobility Plan 2035. Additionally, the Project would comply with the City of Los Angeles Solid Waste Management Policy Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills.

Los Angeles Green Building Code

The Project would comply with the Los Angeles Green Building Code by complying with the California 2022 Title 24 Building Energy Efficiency Standards, as codified with amendments by the City. The Project would also meet the mandatory measures of the CALGreen Code as amended in the LAMC by the City by incorporating strategies, such as the use of tree landscaping to provide passive solar shading and green roofs to reduce the urban heat island effect. The Project would also comply with applicable solar and EV charging installation regulatory

requirements. Other building features would include such items as installation of eco-friendly and recycled building materials, systems, and features wherever feasible, including energy efficient appliances, water saving/low-flow fixtures, green roofs, permeable pavers, non-volatile organic compound paints/adhesives, drought-tolerant planting, weather- or soil-based automatic irrigation system controllers, and a high-performance building envelopment. Therefore, the Project would not conflict with the Los Angeles Green Building Code.

Conclusion

Based on the above, the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable goals and actions for reducing GHG emissions. The Project's consistency with applicable GHG reduction plans and policies demonstrate that the Project would not conflict with regulations and policies and complies with the regulations and reduction actions/strategies outlined in the CARB's Climate Change Scoping Plan, the SCAG's 2025-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Therefore, the Project would not conflict with plans adopted for the purpose of reducing GHG emissions, and the Project's GHG emissions would result in less-than-significant impacts. No mitigation measures would be required.

Mitigation Measures

None required.

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 it 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?	☐	☐	☒	☐

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.

Construction

As discussed in detail in **Checklist Section 4.X, Hydrology and Water Quality**, the Project would be required to comply with the stormwater drainage and retention requirements of Section 4.106.2 of the CALGreen Code and Section 99.04.106.2 of the LAMC during construction which prevents the spread of contaminants into surface waters through runoff. Additionally, any potentially hazardous materials would be used and stored in designated construction staging areas within the boundaries of the Project Site. Furthermore, the transport, use, and storage of hazardous materials during the construction of the Project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. The use of potentially hazardous materials associated with standard construction activities for their intended purpose would not pose a significant risk to the public or environment.

It is anticipated that the amounts of hazardous materials required for construction would be of typical amounts; however, if hazardous materials and/or petroleum products are stored on the Project Site above applicable regulatory thresholds, the applicable documents and plans would be submitted accordingly. These thresholds include those outlined in the Hazardous Material Business Plan rules (California Health and Safety Code, Division 20, Chapter 6.95, Article 1; 19 CCR, Division 2, Chapter 4) and Spill Prevention, Control, and Countermeasure Plan rules (40 CFR, Chapter 1, Subchapter D, Part 112). Appropriate plans would be prepared as required by regulation and submitted to the local Certified Unified Program Agency, which, for the City, is the Los Angeles Fire Department (LAFD), and kept onsite through construction of the Project. BMPs and spill prevention and response procedures required by these rules would be implemented.

Hazardous wastes accumulated during Project construction may include unused or off-specification paint and primer, paint thinner, solvents, and vehicle- and equipment-maintenance-related materials, many of which can be recycled. Empty containers for such materials (e.g., drums and totes) may also be returned to vendors, if possible. Hazardous waste that cannot be recycled would be transported by a licensed hazardous waste hauler using a Uniform Hazardous Waste Manifest and disposed of at an appropriately permitted facility. The transport and disposal of these substances is subject to applicable federal, state, and local health and safety laws and regulations that are intended to minimize health risk to the public associated with hazardous materials.

Operation

The use and disposal of hazardous materials associated with operations of the Project would not differ substantially in type or quantity from other typical and nearby residential land uses (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products), none of which are currently considered environmental concerns when used, stored, and disposed of consistent with manufacturer's recommendations and regulatory requirements and guidelines.

Summary

Based on the above, adherence to federal, state, and local regulations for the use, storage, and disposal of hazardous materials and wastes, would ensure that the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (vehicle fuels, paints, oils, and transmission fluids) occur or if contaminated soils and/or groundwater are encountered during excavation and proper erosion controls are not implemented. As detailed above, implementation of stormwater control measures consistent with the requirements of CALGreen and the LAMC, as well as adherence to federal, state, and local regulations regarding the use, storage, transport, and disposal of hazardous materials during construction would ensure that construction activities would not release hazardous materials into the environment. Based on searches of the Department of Toxic Substances Control's EnviroStor Database and California State Water Resource Control Board's GeoTracker Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste

contamination and no such sites are located within 1,000 feet of the Site.[55,56] Therefore, it would not be expected that construction of the Project would encounter contaminated soils, groundwater, or soil vapor that could be released into the environment.

As discussed above, the use of common, household hazardous material during operation would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. In addition, the Project Site is not located within a Methane Zone or Methane Buffer Zone[57] and would, therefore, not experience methane seepage.

Based on the above, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located within 0.25-mile of the Project Site. The nearest school to the Site is the Los Angeles Leadership Academy (234 E. Avenue 33), located approximately 0.37-mile to the northwest. As such, the Project would not emit or handle hazardous materials, substances, or waste within 0.25-mile of a school. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?

No Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental

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55 *Department of Toxic Substances Control, Envirostor database, 2830 N. Prewett Street plus 1,000-foot radius search, available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=2830+n+prewett+street%2C+los+angeles%2C+ca, accessed December 19, 2023.*

56 *California State Water Resource Control Board, GeoTracker database, 2930 N. Prewett Street plus 1,000-foot radius search, available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=2830+n+prewett+street%2C+los+angeles%2C+ca#, accessed December 19, 2023.*

57 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

Protection on at least an annual basis. The Project Site is not listed on any government database of hazardous materials sites.[58] As such, the Project would not create a significant hazard to the public or environment related as a result of the Site's inclusion on such lists. Therefore, no impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within any airport's influence area nor within two miles of an existing airport.[59] The nearest airport is the San Gabriel Valley Airport (4233 Santa Anita Avenue, El Monte), located approximately 9.8 miles to the east. Therefore, the Project would not result in a safety hazard or excessive noise for people living in the Project area as a result of airports. No impact would occur and no mitigation measures would be required.

Mitigation Measures

None required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The Emergency Management Department (EMD) leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Master Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response plans. Development projects have the potential to impair implementation of emergency response or evacuation plans through physical alterations to designated disaster routes or facilities or through the addition of substantial numbers of vehicles/traffic along disaster routes.

Consistent with the requirements of the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403), construction materials and equipment would not be permitted to be stored in the public right-of-way in any manner that reduces roadway clearance to less than 20-feet in width and that any storage of construction materials and equipment on public property would require a street use permit from the Bureau of Street Services. Accordingly, adequate emergency access to the Site and surroundings would be maintained during construction. With regards to operation, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way and would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As discussed in further detail in **Checklist**

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58 *California Environmental Protection Agency, Cortese List Data Resources, https://calepa.ca.gov/SiteCleanup/CorteseList/, accessed December 19, 2023.*

59 *County of Los Angeles, Department of Regional Planning, Airports and Airport Influence Areas, August 2018, https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf, accessed December 19, 2023.*

Section XV, Public Services, the Project's proposed design, including ingress/egress and dedications and improvements to the public right-of-way would be subject to review and approval by the BOE, LADOT, and LAFD. Furthermore, Project improvements to N. Thomas Street adjacent to the Site would improve emergency access along N. Thomas Street in the vicinity.

Although evacuation routes and shelters are determined during an emergency based on availability and current conditions, in the event of an emergency evacuation of the Project area, there are several pre-designated disaster routes in the greater Project area including: N. Broadway; N. Mission Road; Huntington Drive; Soto Street; Pasadena Avenue; and the I-5, I-10, and CA-110 Freeways.[60] The Project would introduce additional traffic onto these disaster routes during an emergency evacuation; however, as detailed further in **Section XVII, Transportation**, of this IS/MND, the addition of vehicles associated with a single-family residence and attached ADU would represent a negligible increase that would not be expected to result in substantial delays or capacity exceedances during an emergency.

Based on the above, the Project would not physically alter a designated disaster route or facility and would not add a substantial amount of vehicles/traffic along disaster routes in a manner that would impair or interfere with emergency response or evacuation. As detailed in response to **Checklist Question XV(a)** and **Checklist Question XV(b)**, the Project can be adequately served by emergency services. As such, the Project would not Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation would be required.

Additionally, the Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. Modifications to N. Thomas Street would be in accordance with Bureau of Engineering, LADOT, and Los Angeles Fire Department access requirements. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone.[61] This designation includes "lands designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors."[62] Areas designated within a Very High Fire Hazard Severity

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60 *County of Los Angeles, Department of Public Works, Disaster Route Map: City of Los Angeles, Central Area, August 13, 2008, available at https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf, accessed January 9, 2024.*

61 *City of Los Angeles Department of City Planning, Zone Information & Map Access System,* available at*: http://zimas.lacity.org.*

62 *City of Los Angeles Department of City Planning, Zone Information & Map Access System,* available at*: http://zimas.lacity.org, accessed October 3, 2021.*

Zone are required to be designed and constructed in accordance with the Los Angeles Fire Code and would be required to incorporate measures, including but not limited to the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

Additionally, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with Los Angeles Fire Department (LAFD) to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Additionally, owners of the proposed residence would be required to comply with the brush clearance requirements of LAMC Section 57.4906.5.1, including the additional brush clearance requirements for properties within the VHFHSZ, and to maintain defensible space per regulation found in the California Government Code Section 51175—51189 for the VHFHSZ within Local Responsibility Areas. Accordingly, the Project would comply with current building codes as well as regulations regarding maintenance of defensible space and would not directly or indirectly expose people or structures to significant risk of loss involving wildland fires. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

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

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board ("LARWQCB"). The City's water quality and waste discharge regulations include the NPDES permitting system implemented by the LARWQCB; LAMC Chapter VI, Article 4.4 (Stormwater and Urban Runoff Pollution Control), which was established by the Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176) and set the foundation for stormwater management in the City of Los Angeles. Chapter VI, Article 4.4 of the LAMC also contains provisions for stormwater pollution control measures for development planning and construction activities adopted in 2011 by Ordinance No. 181,899 (Stormwater LID Ordinance or "LID Ordinance") and revised in 2024 by Ordinance No. 188,125.[63]

[63] *Revisions to the City's LID Ordinance adopted by Ordinance No. 188,125 apply to projects with a building or grading permit payment date of April 2, 2024. The Project's original permit application (No. 22010-30000-01044) was submitted on March 3, 2022. The standard 18-month plan check application period for the Project began on March 1, 2023 due to the Covid-19 Emergency Tolling of Deadlines Related to Expiration of Permits and Related Documents (Document P/GI 2023-033). Therefore, the Project's plan check application period expired on August 1, 2024 and the Project requires submittal of a new building and grading permit application, the submittal and*

The NPDES Permit requires all construction activities disturbing one acre of land or more to prepare a Stormwater Pollution Prevention Plan (SWPPP) documenting the selection and implementation of best management practices (BMPs) to prevent discharges of water pollutants to surface or groundwater. Chapter VI, Article 4.4 contains general requirements and prohibitions related to the control and discharge of pollutants into the stormdrain system and downstream receiving waters. In addition, the revised LID Ordinance requires that LID measures be incorporated into the design of:[64]

- New development projects equal to one acre or more of disturbed area and adding 10,000 square feet of impervious surface area;
- New industrial parks of 10,000 square feet or more of surface area;
- New commercial malls of 10,000 square feet or more of surface area;
- Redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface area on existing sites of 10,000 square feet or more of impervious surface area, industrial parks of 10,000 square feet or more of surface area, or commercial malls of 10,000 square feet or more of surface area;
- New development or redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface and support restaurants, parking lots, automotive service facilities, or retail gasoline outlets; and
- New development or redevelopment projects that create and/or replace 2,500 square feet or more of impervious surface area and are located partly or wholly within an Environmentally Sensitive Area.[65]

Construction

The Project's proposed construction activities would not require compliance with the state's General Construction NPDES Permit and the development of a construction SWPPP because the Project Site is less than one-acre in size. The Project would add over 2,500 square feet of impervious surfaces (4,742 square feet consisting of the 3,805 square-foot building footprint, the 482 square-foot pool, and 455 square feet of impermeable hardscape [e.g., steps, pool coping, and landscape walls]); however, Project Site is not located within an area designated as a

payment date of which will be after April 2, 2024. As such, the Project is subject to the revised LID Ordinance No. 188,125.

64 *City of Los Angeles, Department of Public Works, LA Sanitation and Environment, Watershed Protection Division, Low Impact Development, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-lid, accessed January 1, 2025.*

65 *As established in the LARWQCB MS4 Permit, Environmentally Sensitive Areas subject to stormwater mitigation requirements are: areas designated as Significant Ecological Areas by the County of Los Angeles (Los Angeles County Significant Areas Study, Los Angeles County Department of Regional Planning (1976) and amendments); an area designated as a Significant Natural Area by the California Department of Fish and Wildlife's Significant Natural Areas Program, provided that the area has been field verified by the Department of Fish and Game; an area listed in the Basin Plan as supporting the "Rare, Threatened, or Endangered Species (RARE)" beneficial use; and an area identified by a Permittee as environmentally sensitive.*

Significant Ecological Area by the County of Los Angeles;[66] an area designated as a Significant Natural Area by the California Department of Fish and Wildlife's Significant Natural Areas Program;[67] an area listed in the Basin Plan as supporting the "Rare, Threatened, or Endangered Species (RARE)" beneficial use;[68] or an area identified by a Permittee as environmentally sensitive.[69] Accordingly, the Project would also not be required to implement the LID design requirements of the City's LID Ordinance (Ordinance No. 188,125).

Construction associated with the Project would be subject to the general pollutant control requirements and discharge prohibitions of LAMC Chapter VI, Article 4.4, which prohibit discharge, spills, dumping, or disposal of waste, debris, pollutants, and hazardous substances to the stormdrain system or receiving waters. Furthermore, the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175-A01, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[70] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan. In addition, the Project would also be subject to the erosion control system requirements of LAMC Section 91.7007.1, which limits the amount and timing of grading during the rainy season (defined as between October 1 and April 15).

Additionally, groundwater was not encountered to depths of 5.5 feet below the surface during subsurface exploration of the Project Site and the Geotechnical Report stated that groundwater is not anticipated to pose an issue during Site development.[71] As such, it is unlikely that construction activities would encounter groundwater or otherwise have the potential to affect groundwater quality. Furthermore, all grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion impacts to acceptable levels. The standard conditions imposed by the City of

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66 *Los Angeles County, Department of Regional Planning, Significant Ecological Areas Program Significant Ecological Areas (SEA) and Coastal Resource Areas, January 2022, https://planning.lacounty.gov/wp-content/uploads/2022/10/map_t02-seas.pdf, accessed January 10, 2025.*

67 *California Department of Fish and Wildlife, Lands Viewer, https://apps.wildlife.ca.gov/lands/, accessed January 10, 2025.*

68 *Los Angeles Regional Water Quality Control Board, Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, Chapter 2: Beneficial Uses Figures, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/2020/Chapter_2/Chapter_2_Beneficial_Uses_Figures/Chapter_2_Maps_of_Surface_Waters,_Ground_Waters,_and_Coastal__Features.pdf, accessed January 10, 2025.*

69 *City of Los Angeles, Zoning Information and Map Access System, https://zimas.lacity.org, accessed January 10, 2025.*

70 *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

71 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 3.*

Los Angeles Department of Building and Safety, would ensure that soil erosion and its associated impacts to water quality are minimized during construction.

Operation

Stormwater runoff from the Project Site has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (oil/grease, household cleaners, and trash). The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176) to ensure pollutant loads from the Project Site are minimized for downstream receiving waters. The ordinance contains discharge prohibitions and requirements for construction activities and operation of projects to prevent, control, and reduce stormwater runoff pollution. Consistent with Ordinance No. 172,176, the Project would be prohibited from discharging any pollutants or hazardous materials to the stormdrain system or receiving waters.

The Project's roofs and decks would collect stormwater and discharge it to planter boxes. In addition, the Project would include 1,211 square feet of permeable hardscape (pavers and steps), 590 square feet of permeable decks, and 80 square feet of mulched areas, for a total of 1,881 square feet of permeable surfaces for incidental rainfall. These features would pre-treat/re-use the first flush from the Project Site to protect local water resources to the maximum extent practicable. Conformance with applicable water quality ordinances would be ensured during the City's building plan review and approval process.

Summary

Based on the above, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction or operation. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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. Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. Potable water will be supplied by the LADWP, which draws water supplies from distant sources and which conducts its own assessments and mitigation of potential environmental impacts. The Project would not include any subterranean levels and groundwater was not encountered during exploration, conducted to a maximum depth of 5.5 feet below the existing ground surface.[72] Furthermore, although the Project would increase the amount of impervious cover at the Site, approximately 4,794 square feet of the 9,536-square-foot Site would remain pervious. Pervious

[72] *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021, page 3.*

surfaces at the Project Site would comprise 2,913 square feet of landscaped area , and 1,881 square feet of permeable hardscape. As such, the Project would not decrease groundwater supplies or substantially interfere with groundwater recharge. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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; or

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.

iv. Impede or redirect flood flows?

Less than Significant Impact.

Construction

Project construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion during storm events. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required by CALGreen Section 5.106 to prevent the transport of sediments and pollutants from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in an ESCP, which must be acceptable to the City and in compliance with NPDES standards. The Project would also be subject to the erosion control system requirements of LAMC Section 91.7007.1, which limits the amount and timing of grading during the rainy season (defined as between October 1 and April 15). Additionally, all grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential erosion impacts to acceptable levels. Measures to control erosion and stormwater runoff from construction sites have the secondary benefits of preventing runoff-related flooding and pollution movement. Through compliance with county and City erosion control requirements for construction, the Project would not result in erosion or siltation, on- or off-site flooding, or polluted runoff during construction. Therefore, impacts would be less than significant during construction and no mitigation measures would be required.

Operation

Existing surface drainage at the Project Site is by sheet flow runoff down the grade of the Site towards the southwest. No underground stormdrain facilities exist in the streets in the surrounding hillside. The Project would develop 4,742 square feet of impervious surfaces including the 3,805-square-foot building footprint, a 482-square-foot pool, and 455 square feet of additional impervious hardscape consisting of walkways, steps, coping, and walls.

Consistent with the requirements of the NPDES permit, the Project would be required to reduce the volume of runoff from the Project Site when compared to existing conditions. As previously discussed, the Project's roofs and decks would collect stormwater and discharge it to flow-through planter boxes. In addition, the Project would include 1,211 square feet of permeable hardscape (pavers and steps), 590 square feet of permeable decks, and 80 square feet of mulched areas, for a total of 1,881 square feet of permeable surfaces for incidental rainfall. The Project's stormwater management features would be sized to accommodate the anticipated stormwater flow. Furthermore, as detailed in response to **Checklist Question X(a),** the Project would be required to comply with NPDES standards and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176) to ensure pollutant loads from the Project Site are minimized for downstream receiving waters. As such, the Project would not alter the existing drainage pattern of the Project Site in a manner that would result in erosion, flooding, exceedance of storm drainage systems, or provide sources of polluted runoff. Therefore, impacts would be less than significant during operation and no mitigation measures would be required.

Flood Flows

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas of minimal flood hazard,[73] and the City identifies the Project Site outside of a flood zone.[74] In addition, no streams or rivers that may overflow or breech a levee are located on or near the Project Site. The Site is not located within a tsunami hazard area or potential inundation area of a dam or flood control basin.[75] As such, the Project would not be expected to encounter flood flows. Therefore, no impacts would occur and no mitigation measures would be required

Mitigation Measures

None required.

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

No Impact. As detailed above, the Project Site is not located within a flood hazard, tsunami, or seiche zone. Furthermore, the Project proposes a residential land use, which does not represent the type of use that would otherwise degrade water quality (e.g., an industrial land uses or point-

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73 *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1629F, effective September 26, 2008, website: https://msc.fema.gov/portal/search, accessed December 27, 2023.*

74 *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

75 *County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990.*

source discharges of polluted water). Anticipated and potential pollutants generated by the Project would be limited to those typical of residential land uses and include pesticides, cleaning products, trash, and oil/grease. These materials would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Water quality control plans applicable to the Project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL)[76] Implementation Plans and Watershed Management Plans.

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, construction of the Project is not expected to encounter groundwater and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the Los Angeles County MS4 Permit, Development Construction Program, including preparation of an ESCP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the proposed residential land use does not represent the type of use that would have the ability to adversely affect water quality. While the development of a new building would slightly increase the use of on-site hazardous materials (i.e., those typically used on residentially zoned properties such as cleaning products, paints, trash, etc.), compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous

[76] *Total Maximum Daily Load (TMDL)is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.*

materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders were required to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically overdrafted basins) to achieve groundwater sustainability.

The Project Site does not directly overlie a groundwater basin[77] and would not require and does not propose direct groundwater withdraw for any purpose including supply or dewatering. The Project would receive its water from the LADWP, who receives approximately eight percent of its total water supply from groundwater.[78] Locally, the City holds water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins, all of which have been adjudicated by California courts and are governed by judicial decrees, including the Upper Los Angeles River Area (ULARA Groundwater Basin Adjudication, which encompasses the San Fernando, Sylmar, Verdugo, and Eagle Rock basins.[79] Both the LADWP and the California Department of Water Resources have programs in place to monitor supply wells to prevent overdrafting of groundwater basins. Both the LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Furthermore, protection from potential overdraft conditions is a requirement of the various adjudication decrees, including the ULARA Judgement. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years. As described in detail in **Checklist Question XIX(b),** the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, impacts would be less than significant and no mitigation measures would be required.

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77 *California Department of Water Resources, Sustainable Groundwater Management Act Basin Prioritization Interactive Map, available at: https://gis.water.ca.gov/app/bp-dashboard/final/, accessed December 27, 2023.*

78 *City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2020, page 5-1.*

79 *City of Los Angeles, Department of Water and Power, Urban Water Management Plan, 2020, pages 5-1 through 5-4.*

Mitigation Measures

None required.

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?	☐	☐	☒	☐

a) Physically divide an established community?

Less than Significant Impact. The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan area. The Project would develop a single-family residential dwelling and associated ADU consistent with the Project Site's zoning and land use designation. The Project would not directly disrupt, divide, or isolate an existing neighborhood or community, as all proposed improvements would occur within the boundaries of the existing Project Site. Additionally, the Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. Moreover, the Project would improve N. Thomas Street adjacent to the Site through widening to 20 feet consistent with the requirements of LAMC Section 12.21.C.10(i)(3), and would include a three-foot dedication, which would improve public access along N. Thomas Street in the vicinity of the Project Site.

Implementation of the Project would result in further residential development within an existing residential community. Single-family residences between one and two stories currently exist both on the same side of and across N. Thomas Street and therefore, the construction of a new, two-story residence and attached ADU would not create a conflict of scale, intensity, or use that would serve as an indirect physical division. As such, the Project would not physically divide an established community. Therefore, related impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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. Regionally, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the federally designated

metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. As the Project proposes one new single-family residence and associated ADU, the Project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206(b)(2)(D); therefore, no further analysis of SCAG consistency is required. The Project is also located within the regional planning area of the South Coast Air Quality Management District (SCAQMD)'s Air Quality Management Plan (AQMP). As evaluated in **Checklist Section III, Air Quality**, the Project is consistent with the AQMP, and no further analysis is required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of local land use plans and zoning ordinances, discussed below.

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element, and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Northeast Los Angeles Community Plan area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table XI-1, Project Consistency with the Framework Element**. Applicable objectives and policies for single-family residential uses begin with Objective 3.5. As shown, the Project would be consistent with the applicable objectives and policies.

Table XI-1
Project Consistency with the Framework Element

Objective/Policy [1]	Project Consistency
Land Use Chapter	
Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.	**Consistent.** The Project would develop a new single-family residence and attached ADU on a parcel designated for low density residential. The Project would be consistent the single-family residential uses in the vicinity of the Site and within the surrounding community. The Project would be consistent with

Table XI-1
Project Consistency with the Framework Element

Objective/Policy [1]	Project Consistency
	zoning for the parcel and would increase residential density on a currently unutilized site, therefore creating compatible development in an otherwise urbanized location.
Policy 3.5.1: Accommodate the development of single-family dwelling units in areas designated as "Single-Family Residential" on the General Plan Framework Long-Range Land Use Diagram, in accordance with Table 3-1. The density permitted for each parcel shall be identified in the community plans using land use categories specified in Table 3-2.	**Consistent.** The proposed single-family residence and ADU would be consistent with the existing R1 zoning and the Community Plan designation of Low Residential. The Project would be consistent with the permitted single-family uses and density pursuant to Tables 3-1 and 3-2 of the Framework Element, as referenced.
Policy 3.5.2: Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale.	**Consistent.** The Project's yard setbacks would be consistent with the Hillside Area Development Standards. In addition, the residence would be two-stories, consistent with the surrounding residential development, which ranges in scale from one- to two-stories.
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	**Consistent.** The Project would develop a new single-family residence and ADU on a currently unutilized parcel. This would create additional housing stock and would create a single-family ownership opportunity.
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	**Consistent.** The Project would develop a new single-family residence and ADU on a parcel designated for low density residential uses, in compliance with the underlying General Plan land use designation and existing zoning. The development of a single-family housing unit would add housing stock to the City and create ownership opportunities on a currently unutilized parcel.
Policy 4.1.4: Reduce overcrowded housing conditions by providing incentives to encourage development of family-size units.	**Consistent.** The Project would develop a new, four-bedroom, 3,938-square-foot, single-family residence and attached, two-bedroom 800-square-foot ADU. These homes would be anticipated to serve families.
Objective 4.3: Conserve scale and character of residential neighborhoods.	**Consistent.** The Project would develop a two-story, 3,938-square-foot, single-family residence and attached. 800-square-foot ADU on a currently vacant parcel zoned and designated for low density residential land uses. In general, the land uses in the vicinity of the Project Site and the surrounding community consist of low density, single- and multi-family residences ranging from one- to three-stories. Accordingly, the Project would develop a residence that would be consistent with the scale and character of existing off-site residences in the vicinity and community.

Table XI-1
Project Consistency with the Framework Element

Objective/Policy [1]	Project Consistency
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The Project Site is located within approximately 0.4-mile of N. Broadway, which is developed with a diversity of land uses, particularly commercial, that connect and serve the surrounding neighborhoods, and includes Metro bus service.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent:** The Project would develop a currently unutilized site with a new single-family residential use that would be constructed to the latest resource-efficient requirements of the LA Green Building Code, thereby improving the quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**Consistent:** The continuous visible and non-visible presence of residents on the Project Site at all times of the day would provide a sense of security during evening and early morning hours. The Project proposes to improve N. Thomas Street adjacent to the Site, including dedication to accommodate emergency access and be consistent with LAMC Section 12.21.C.10(i)(3).
1 City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001. *Source (table): EcoTierra Consulting, October 2023.*	

Northeast Los Angeles Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Northeast Los Angeles Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. With regard to residential land uses, the Community Plan identifies opportunities for the preservation and enhancement of the positive characteristics of residential neighborhoods while providing a variety of compatible new housing opportunities.

As set forth in the Community Plan, the Project Site is designated for Low Density Residential.[80] The Project's single-family residential land use would be consistent with this land use designation. The Project's consistency with the applicable objectives and policies of the Northeast Los Angeles Community Plan is presented in **Table XI-2, Project Consistency with the Northeast Los Angeles Community Plan**. As shown, the Project would be consistent with the applicable objectives and policies.

80 City of Los Angeles, General Plan Land Use Map, Northeast Los Angeles Community Plan, as of June 25, 2014, available at: https://planning.lacity.org/odocument/f5a6cf16-6100-48ea-9bb7-f1b469970d98/nlaplanmap.pdf.

Table XI-2
Project Consistency with the Northeast Los Angeles Community Plan

Objective/Policy [1]	Project Consistency
Objective 1-1: To preserve and enhance existing residential neighborhoods.	**Consistent.** The Project would construct a new single-family residence and attached ADU on a parcel zoned and designated for residential land uses within an existing residential neighborhood. Thus, the Project would enhance an existing residential neighborhood with additional housing.
Policy 1-1.1: Protect existing stable single-family and other lower density residential neighborhoods from encroachment by higher density residential and other uses that are incompatible as to scale and character or would otherwise diminish the quality of life.	**Consistent.** The Project would develop a new, two-story, single-family residence and attached ADU on a parcel zoned and designated for low density residential land uses in an existing residential neighborhood currently developed with one- to two-story, single-family residences. Therefore, the Project would not be of a higher density or incompatible in scale or character with the existing neighborhood.
Policy 1-1.2: Promote neighborhood preservation, particularly in single-family neighborhoods, as well as in areas with existing multiple-family residences.	**Consistent.** The Project would develop a new single-family residence and attached ADU on a parcel zoned and designated for low density residential land uses in an existing single-family residential neighborhood, thus protecting the existing single-family neighborhoods from encroachment of higher density land uses.
Objective 1-2: To allocate land for new housing to accommodate a growth of population that is consistent with and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and government services, especially schools.	**Consistent.** The Project would develop new housing. As detailed in **Section XV, Public Services**, and **Section XIV, Utilities and Service Systems**, there would be adequate infrastructure and government services to serve the Project and the Project would not result in significant impacts to infrastructure or government services.
Policy 1-2.1: Designate specific areas to provide for adequate residential development to accommodate anticipated increases in population while maintaining a balance between single-family and multiple-family uses.	**Consistent.** The Project would develop a single-family residence and attached ADU, which would help to accommodate increases in population and maintain the existing single-family neighborhood.
Objective 1-3: To preserve and enhance the residential character and scale of existing single- and multi-family neighborhoods.	**Consistent.** The Project would develop a two-story, single-family residence and attached ADU on a vacant parcel in an existing single-family residential neighborhood consisting of one- and two-story residences. As such, the Project would enhance the residential character and preserve the scale of an existing single-family neighborhood.
Policy 1-3.1: Protect the quality and scale of the residential environment through attention to the appearance of new construction including site planning and compatible building design.	**Consistent.** The Project would develop a new two-story single-family residence and attached ADU that has been designed to conform to the existing hillside and would not exceed a 15-foot height envelope above the existing grade. As such, the Project would protect the quality and scale of the residential environment through compatibility with the scale of the existing residences and with the natural grade of the parcel.

Table XI-2
Project Consistency with the Northeast Los Angeles Community Plan

Objective/Policy [1]	Project Consistency
Objective 1-5: To limit the intensity and density of development in hillside areas.	**Consistent.** The Project would develop a single-family residence and attached ADU on a hillside parcel that would be compatible with the allowed intensity and density of the underlying low density land use designation and as allowed pursuant to the Northeast Los Angeles Hillsides Zone Change Ordinance as amended by ZI No. 2462.
Policy 1-5.1: Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	**Consistent.** The Project proposes to widen N. Thomas Street to a minimum of 20 feet adjacent to the Project Site, consistent with the requirements of LAMC Section 12.21.C.10(i)(2). The Project includes a discretionary approval for a Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Prewett Street) without providing a 20-foot wide adjacent minimum roadway adjacent to the property as required by LAMC Section 12.21.C.10(i)(2). In addition, The Project includes a discretionary approval for a Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Thomas Street) where a minimum 20-foot wide Continuous Paved Roadway is not provided from the driveway apron to the boundary of the Hillside Area, as required by LAMC Section 12.21.C.10(i)(3). As detailed in the land use analysis below, the Project meets the conditions for relief from the requirements of LAMC Section 12.21.C.10(i)(2) and Section 12.21.C.10(i)(3) as established in LAMC Section 12.24.X.28(b)(7) and with approval of the above requested discretionary approvals, the Project would be consistent with the applicable requirements of the LAMC with regard to street access.
Policy 1-5.2: Ensure the availability of paved streets, adequate sewers, drainage facilities, fire protection services and facilities, and other emergency services and public utilities to support development in hillside areas.	**Consistent.** N. Thomas Street would provide access to the Project Site and the Project would further provide required widening and dedication of N. Thomas Street adjacent to the Site. As such, paved streets are available to serve the Project. In addition, as detailed in **Checklist Section XV, Public Services**, and **Section XIX, Utilities and Service Systems**, of this IS/MND, adequate public services and utilities, including sewers, drainage facilities, fire protection services and facilities, and other emergency services and public facilities, are available to support Project development.

Table XI-2
Project Consistency with the Northeast Los Angeles Community Plan

Objective/Policy [1]	Project Consistency
Policy 1-5.3: Consider the steepness of the topography and the geologic stability in any proposal for development within the Plan area.	**Consistent.** The proposed development has been designed to reflect the existing topography of the Site. As detailed in **Section VII, Geology and Soils**, the Project's Geotechnical Report evaluated the steepness and geologic stability of the Project Site and determination that the Project is feasible from a geotechnical engineering perspective. In order to ensure that proposed development complies with slope limitations, as well as with the Planning Guidelines Landform Grading Manual, the Northeast Los Angeles Hillsides Zone Change Ordinance requires review and approval of the Project's Geotechnical Report, including its conclusions and recommendations, from LADBS. LADBS found the Project's Geotechnical Report acceptable and issued an approval letter on May 27, 2021. As required by LAMC Section 91.7006, all recommendations and standards for the project within the Geotechnical Report and LADBS' approval letter would be incorporated into the Project's Plan, which would be confirmed as part of the building permit plan check process.
Policy 1-5.4: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**Consistent.** The Project would develop a new, two-story, single-family residence and attached ADU within an existing single-family neighborhood developed with other one- and two-story residences. As such, the Project would be compatible with adjacent development.
Policy 1-5.5: Encourage clustering of residential projects in order to use the natural terrain to best advantage.	**Consistent.** The Project would develop a new single-family residence and attached ADU in an existing residential neighborhood and has been designed to be consistent with the existing hillside topography. Therefore, the Project would cluster a residential use within existing residential land uses and would account for the natural terrain.
Objective 1-6: To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background.	**Consistent.** The Project would not be legally permitted to preclude ownership based on age, ethnicity, religion, or race.
Policy 1-6.1: Promote individual choice in type, quality, price, and location of housing.	**Consistent.** The Project is a privately owned and funded residence and thus, the type, quality, price, and location has been based on individual choice.

1 City of Los Angeles Department of City Planning, Northeast Los Angeles Community Plan, adopted June 15, 1999.
Source (table): EcoTierra Consulting, September 2024.

Los Angeles Municipal Code

Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I, the Planning and Zoning Code and Section 12.21.C, the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403), and the Baseline Hillside Ordinance (Ordinance No. 181,624—as amended by Modifications to Single-Family

Zones and Single-Family Zone Hillside Area Regulations [Ordinance No. 184,802]). As part of the Project, the Project is requesting Zoning Administrator Determinations to: (1) permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Prewett Street) without providing a 20-foot wide adjacent minimum roadway adjacent to the property as required by LAMC Section 12.21C.10(i)(2); and (2) permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Thomas Street) where a minimum 20-foot wide Continuous Paved Roadway is not provided from the driveway apron to the boundary of the Hillside Area, as required by LAMC Section 12.21C.10(i)(3). The following paragraphs discuss the Project's compliance with the building standards of the LAMC with inclusion of the above requested reliefs.

Land Use

The Project Site is zoned [Q]R1-1D-HCR (Qualified One-Family Residential, Height District 1 with Development Limitations, Hillside Construction Regulation). Pursuant to LAMC Section 12.08.A, the R1 zone allows for single-family residences and ADUs. Therefore, the Project's proposed land uses would be allowed by the zoning.

Lot Size

LAMC Section 12.08.C.4 requires every lot in the R1 zone to have a minimum width of 50 feet and a minimum area of 5,000 square feet. With the Project's proposed lot tie, the Project Site complies with these requirements.

Floor Area

LAMC Section 12.21.C.10(b) limits the maximum RFA within hillside areas to lot-specific slope band analyses. Allowed RFA is based on the square-footage of the lot within ranges of slope steepness and the zoning of individual lots. However, LAMC Section 12.21.C.10(l)(4) exempts properties subject to the Northeast Los Angeles Hillside Ordinance (Ordinance No. 180,403) from the maximum RFA limits of LAMC Section 12.21.C.10(b). The RFA limits of Ordinance No. 180,403 are substantially the same as those of LAMC Section 12.21.C.10(b), however, additional floor area is allowed within slope bands of 0—14.99 percent. As presented in **Table XI-3, Project Allowed Floor Area**, pursuant to the limits of Ordinance No. 180,403, the Project's maximum allowed RFA is 4,128.83 square feet. The Project proposes a 3,938-square-foot, single-family residence,[81] which would be consistent with the maximum allowed RFA of Ordinance No. 180,403. The 3,938-square-foot RFA consists of the two-story residence (3,873 square feet) and the non-exempted remnant portion of the parking garage (65 square feet). The parking garage is 465 square feet but the Northeast Los Angeles Hillside Ordinance exempts 400 square feet of covered parking area. Furthermore, the Project would be required to submit Complete Architectural Drawings, including a site survey by a licensed surveyor and Project RFA calculations, with respective professional license stamp(s), to LADB for verification of the slope band analysis or to DCP for discretionary approval as part of the Project's application for building permit. The Project's Slope Analysis Map is attached to this IS/MND as **Appendix F.1**.

[81] *Pursuant to Government Code Section 65852.2(e)(1)(A), the proposed 800-square-foot ADU does not count towards the calculation of RFA.*

Table XI-3
Project Allowed Floor Area

Slope Bands (%)	Allowed FAR in R1 Zone [1]	Lot Area w/in Slope Band (sf)	Max. Allowed RFA (sf) [2]
0—14.99	0.50	1,907.7	858.5
15—29.99	0.45	3,696.0	1,663.2
30—44.99	0.40	3,593.1	1,437.24
45—59.99	0.35	14.2	4.97
60—99.99	0.30	231.9	69.57
100+	0.00	92.8	0.0
Total		**9,536**	**4,128.83**

sf = square feet; FAR = floor to area ratio; Max = maximum; RFA = residential floor to area ratio
1 City of Los Angeles, Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403).
2 Calculated as Lot Area x Allowed FAR.
Source: N.C. Hansen, Inc., Slope Analysis Map, 2824-2830 Prewett Street, Los Angeles, California, 90031.
Source (table): EcoTierra Consulting, Inc., 2023.

Height

LAMC Section 12.21.C.10(d) limits the maximum height of structures within the R1 zone and a 1D height limitation to 33 feet. However, LAMC Section 12.21.C.10(l)(4) exempts properties subject to the Northeast Los Angeles Hillside Ordinance (Ordinance No. 180,403) from the height limits of LAMC Section 12.21.C.10(b). Ordinance No. 180,403 limits the height of structures at the Project Site to a maximum of 30 feet above adjacent finished grade, or 26 feet above finished grade when the roof of the uppermost story has a slope of less than 25 percent. Due to the Site's location within 50 feet of an identified ridgeline on the "Northeast LA Ridgelines" map, Ordinance No. 180,403 further limits the height of buildings to under a 15-foot envelope parallel to the lowest adjacent finished grade. As previously shown on **Figure 3-4** through **Figure 3-6**, the height of the proposed residence would be within the 15-foot envelope above the natural grade and the maximum height, including fronting the Substandard Hillside Limited Street (N. Prewett Street), would be 22 feet, consistent with the applicable requirements of Ordinance No. 180,403.

Setbacks

Pursuant to Table 12.21.C.10-1 of the LAMC, the Project Site is limited to: (1) a minimum front yard setback not less than 20 percent of the lot depth, which need not exceed 20 feet; (2) a side yard setback not less than five feet with one additional foot added to each required side yard for each increment of 10 feet or fraction thereof for buildings with a height greater than 18 feet; (3) and a minimum rear yard setback not less than 15 feet. LAMC Section 12.21.C.10(a)(2) further establishes a minimum setback of at least five feet for lots fronting Substandard Hillside Limited Street, such as the Project Site. The Project would include a six-foot, 11-inch front yard setback, six-foot side yard setbacks, and a 15-foot rear yard setback, consistent with the applicable requirements of the LAMC.

Lot Coverage

LAMC Section 12.21.C.10(e) limits the lot coverage of buildings and structures of more than six feet over above the natural ground level in height to no more than 40 percent of the area of the

lot. The Project would result in 3,805 square feet of coverage, which would be 39.9 percent of the 9,536-square-foot lot, complying with this limitation of the LAMC.

Parking

The Project's provision of a two-car garage plus two additional uncovered parking spaces complies with the parking space requirements for single-family residential land uses within a Hillside Area of LAMC Section 12.21.C.10(g), which requires 2 covered parking spaces per residential unit.

Street Access

LAMC Section 12.21.C.10(i)(1) prohibits the issuance of a building or grading permit for construction of a single-family residence, such as the Project, on a lot fronting a Substandard Hillside Limited Street unless at least one-half of the width of the Street has been dedicated for the full width of the frontage of the lot to Standard Hillside Limited Street dimensions or to a lesser width as determined by the City Engineer. Accordingly, the Project is providing a three-foot dedication along N. Thomas Street, as required by LAMC Section 12.21.C.10(i)(1).

LAMC Section 12.21.C.10(i)(2) prohibits the issuance of a building or grading permit for construction of a single-family residence, such as the Project, on a lot fronting a Substandard Hillside Limited Street that is improved with a roadway width of less than 20 feet, such as N. Prewett Street and N. Thomas Street, without being granted a deviation through a Zoning Administrator Determination. The Project proposes to widen N. Thomas Street to a minimum of 20 feet adjacent to the Project Site; however, no improvements to N. Prewett Street are proposed. Accordingly, the Project includes a discretionary approval for a Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street without providing a 20-foot wide adjacent minimum roadway adjacent to the property along N. Prewett Street as required by LAMC Section 12.21.C.10(i)(2).

In addition, LAMC Section 12.21.C.10(i)(3), prohibits the issuance of a building or grading permit for construction of a single-family residence, such as the Project, on a lot that does not have a vehicular access route from a street improved with a minimum 20-foot wide continuous paved roadway from the driveway apron that provides access to the main residence to the boundary of the Hillside Area, such as N. Thomas Street, without being granted a deviation through a Zoning Administrator Determination. The Project does not include widening of N. Thomas Street from the proposed driveway apron to the boundary of the Hillside Area. Accordingly, the Project includes a discretionary approval for a Zoning Administrator Determination to permit the construction, use, and maintenance of a new single-family dwelling on a lot fronting on a Substandard Hillside Limited Street (N. Thomas Street) where a minimum 20-foot wide Continuous Paved Roadway is not provided from the driveway apron to the boundary of the Hillside Area, as required by LAMC Section 12.21.C.10(i)(3).

In order for the two deviations from street access requirements described above to be approved, the Project must meet the following conditions established in LAMC Section 12.24.X.28(b)(7):

(i) That the vehicular traffic associated with the Building or Structure will not create an adverse impact on Street access or circulation in the surrounding neighborhood; and

(ii) That the Building or Structure will not be materially detrimental or injurious to the adjacent property or improvements; and

(iii) That the Building or Structure will not have a materially adverse safety impact on the surrounding neighborhood; and

(iv) That the site and/or existing improvements make strict adherence to Paragraph (i) of Subdivision 10. of Subsection C. of Section 12.21 of this Code impractical or infeasible.

As detailed in **Checklist Section XVII, Transportation**, of this IS/MND, Project-generated traffic would not result in significant impacts related to access or circulation through mandatory compliance with the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 108,403). Therefore, the Project meets the Condition (i). Additionally, as demonstrated throughout this IS/MND, development of the proposed residence would not result in significant impacts, including to adjacent properties or improvements as the Project would be subject to the state and City building codes and the recommendations of the Project- and Site-specific Geotechnical Report (see **Checklist Section VII, Geology and Soils**); nor with regard to neighborhood safety as the Project would not increase emergency response time nor generate substantial demand on police services (see **Checklist Section XV, Public Services**). Therefore, the Project meets Condition (ii) and Condition (iii).

With regard to Condition (iv) and the requested deviation from LAMC Section 12.21.C.10(i)(2) requirements to widen N. Prewett Street adjacent to the Project Site to 20 feet, under existing conditions, N. Prewett Street is an undeveloped paper street with an elevation of 580 feet above mean sea level (amsl) at its intersection with Two Tree Avenue and 657 feet amsl at its intersection with N. Thomas Street. As shown in **Appendix F.2**, this results in an approximate slope of 25.5 percent over its approximately 302-foot length.[82]

With regard to Condition (iv) and the requested deviation from LAMC Section 12.21.C.10(i)(3) requirements to widen N. Thomas Street from the Project's driveway to the boundary of the Hillside Area, the Project would widen N. Thomas Street to 20 feet adjacent to the Site. However, existing improvements, including utility poles, street lights, retaining walls, and portions of off-site residences, are currently located within the right-of-way for N. Thomas Street. The Project Applicant has no right to condemn the property of others or purchase it from willing sellers. As such, widening the length of N. Thomas Street to a minimum of 20 feet from the Project's driveway apron to the boundary of the Hillside Area, as required by LAMC Section 12.21.C.10(i)(3) infeasible. It should be noted that, as presented in **Appendix F.3**, the slope of N. Thomas Street varies between 1.1 percent and 54.2 percent along five selected segments of Thomas Street approximately between Alta Street to the south to just north of the Project Site.

Based on the above, the Project meets the conditions for relief from the requirements of LAMC Section 12.21.C.10(i)(2) and Section 12.21.C.10(i)(3) as established in LAMC Section 12.24.X.28(b)(7) and with approval of the above requested discretionary approvals, the Project would be consistent with the applicable requirements of the LAMC with regard to street access.

[82] *Calculated using the slope formula of rise / run x 100. Therefore, 77 feet / 302 feet x 100 = 25.5 percent.*

Retaining Walls

LAMC Section 12.21.C.8 limits the maximum number of retaining walls on any lot to two provided that: (i) the minimum horizontal distance between the two walls is three feet; (ii) neither of the two walls exceed a height of 10 feet; and (iii) the height of a wall located in a required yard does not exceed the height allowed by Section 12.22.C.20.(f) of the LAMC (i.e., three and a half feet in a front yard; six feet in a side or rear yard). The Northeast Los Angeles Hillsides Zone Change Ordinance further limits the maximum total height of all freestanding retaining walls to 12 feet with no individual wall measuring higher than six feet; limits the length of each freestanding retaining wall to a maximum of 75 feet; prohibits a retaining wall from extending beyond one lot; requires a horizontal separation distance between retaining walls equal to the height of the highest wall; requires installation of a standard surface backdrain system for all retaining walls with drainage conducted to the street in a non-erosive device; and requires full screening of retaining walls with landscape plantings.

The Project proposes two retaining walls: retaining wall No. 1 would be located at the pool deck and would have a length of 62 feet and a height of six feet; and retaining wall No. 2 would be located at the house entry area and would have a length of 35 feet, six inches and a height of six feet. The vertical separation between the two retaining walls would be six feet, six inches and as previously shown on **Figure 3-8, Project Renderings**, retaining wall No. 1 would be fully screened by the proposed swimming pool and retaining wall No. 2 would be fully screened with landscaping. All Project drainage has been designed to comply with the applicable requirements of the LAMC and the site- and Project-specific Geotechnical Report. As such, the Project's retaining walls would be consistent with the applicable requirements of the LAMC and the Northeast Los Angeles Hillsides Zone Change Ordinance.

Grading

LAMC Section 12.21.C.10(f) includes limits for the amount of grading and import/export and steepness of slopes within the designated Hillside area. However, LAMC Section 12.21.C.10(l)(4) exempts properties subject to the Northeast Los Angeles Hillside Ordinance (Ordinance No. 180,403) from the grading limits of LAMC Section 12.21.C.10(b). Ordinance No. 180,403 limits grading to a maximum of 500 cubic yards plus a numeric value equal to five percent of the total lot size, up to a maximum of 1,000 cubic yards total. Accordingly, the Project would be limited to a maximum of 976.8 cubic yards of grading.[83] The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading, below the limits of Ordinance No. 180,403.

Northeast Los Angeles Hillsides Zone Change Ordinance

As detailed above, the Project would be consistent with the floor area and height limitations, as well as the retaining wall requirements of the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403). The Ordinance also establishes requirements for infrastructure, building design, landscaping, and environmental. As detailed in **Checklist Section I, Aesthetics**, of this IS/MND, the Project would also be consistent with the building design and landscaping requirements of Ordinance No. 180,403. Infrastructure and Environmental requirements are discussed below.

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[83] *Calculated as 500 cubic yards + (0.05 x 9,536 cubic yards) = 976.8 cubic yards.*

Infrastructure

Infrastructure conditions on the Project Site prohibit the storage of construction materials and equipment in the public right-of-way in a manner that reduces roadway clearance to less than 20 feet in width. Additionally, Ordinance No. 180,403 establishes that construction vehicles are subject to the restriction of the Los Angeles Fire Department Red Flag – No Parking Program and requires the installation of restricted parking signs along the Project Site when required by the Los Angeles Fire Department and/or the Los Angeles Department of Transportation. The Project would be required to comply with these conditions.

Environmental

Ordinance No. 180,403 requires a geotechnical investigation report evaluating the Site's soil and proposed grading to be reviewed and approved by the Los Angeles Department of Building and Safety prior to the issuance of a grading, foundation, or building permit. Ordinance No. 180,403 also requires that grading is conducted in accordance with the Planning Guidelines Landform Grading Manual, and limits the steepness of all new graded slopes to no steeper than two:one (rise:run) and grading volume to a maximum of 500 cubic yards plus an amount equal to five percent of the total lot size, up to a maximum of 1,000 cubic yards total. New hardscape areas are also required to utilize permeable paving systems.

Based on the Site's lot area of 9,536 square-feet, the Project would be limited to a maximum of 976.8 cubic yards of grading. The Project would require approximately 777 cubic yards of cut and 132 cubic yards of fill for a total of 909 cubic yards of grading, which is consistent with the limitation of Ordinance No. 180,403. Consistent with the requirements of Ordinance No. 180,403, the Project has prepared a Geotechnical Report,[84] which has been reviewed and approved by LADBS[85] for consistency with slope limitations, as well as with the Planning Guidelines Landform Grading Manual. The steepness of all new graded slopes would be confirmed during professional inspection and certification by the Project's civil engineer, soils engineer, and engineering geologist as outlined in LAMC Section 91.7008.[86] As also consistent with Ordinance No. 180,403, the Project proposes to use permeable pavers in the driveway and BBQ area.

Los Angeles Green Building Code

The current 2023 LA Green Building Code is based on the 2022 California Green Building Standards Code (commonly known as CALGreen), which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential);

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84 *GeoSoils Consultants, Inc., Geologic and Geotechnical Engineering Report, Proposed Residence with Basement, Swimming Pool, and ADU, Lots 1 and 2, Tract 8002, APN 5208-015-001, 2830 Prewett Street, Los Angeles, California, April 6, 2021.*

85 *City of Los Angeles, Department of Building and Safety, Geology and Soils Report Approval Letter, Log # 117273, May 27, 2021.*

86 *See Checklist Section VII, Geology and Soils, of this IS/MND for additional analysis of grading and the Site's geologic conditions.*

- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential)

The Project would meet the requirements in the LA Green Building Code. The building would incorporate eco-friendly and recycled building materials, systems, and features wherever feasible, including energy efficient appliances, water saving/low-flow fixtures, green roofs, permeable pavers, non-volatile organic compound paints/adhesives, drought-tolerant planting, weather- or soil-based automatic irrigation system controllers, and high-performance building envelopment. The Project would install a raceway located, sized, and identified/reserved for future electric vehicle (EV) charging pursuant to Los Angeles Municipal Code (LAMC) Section 99.4.106.4.2. In compliance with LAMC Section 99.04.211.4, the proposed residences would be solar-ready should future homeowners decide to install solar panels. The residence would be all-electric and would not include connection to existing natural gas supply lines consistent with LAMC Section 99.04.106.8.

Summary

As detailed above, the Project would be consistent with the applicable land use plans, policies, and regulations. Furthermore, the Project would be reviewed by numerous City departments, including the Department of City Planning, LADBS, the Department of Public Works, and the LAFD, and would be required to comply with all conditions imposed by those agencies in order to be consistent with the applicable department plans and policies. As such, the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☐	☒

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

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. According to the California Geologic Energy Management Division, no oil, gas, geothermal, or other known wells are located on or adjacent to the Project Site.[87] As such, the Project would not have the potential to interfere with extraction of oil, gas, or geothermal resources. According to the California Department of Conservation's Mineral Land Classification Maps, the Project Site is located in an area with a Mineral Resource Zone (MRZ) 3 designation, indicating areas containing known or inferred Portland cement concrete aggregate resources of undetermined mineral resource significance.[88] Due to the residential nature of the surroundings, as well as the lack of current and previous mineral extraction activities onsite or in the vicinity, Project implementation is not anticipated to result in loss of availability of a known mineral resource of value to the region and residents of the state. Therefore, no impact to state or regionally important mineral resources would occur.

Mitigation Measures

None required.

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. As detailed in response to Threshold a) above, the Project would have no impact on known mineral resources because the Project Site and surroundings are not designated for mineral extraction land uses, nor are they located within an oil field or drilling area. The Project Site is not currently zoned for mineral extraction and neither the Site nor the surrounding area are used, or designated as potentially available for, the extraction of mineral resources. As such, the Project would not result in the loss of availability of a known mineral resource recovery site of local importance. Therefore, no impacts would occur and no mitigation measures would be required.

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87 *California Department of Conservation, California Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/, accessed December 19, 2023.*

88 *California, Natural Resources Department, Department of Conservation, California Geological Survey, Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions (SR 254 – Plate 1), 2021.*

Mitigation Measures

None required.

XIII. NOISE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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 Impact.

Construction

The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. LAMC Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) prohibits the operation, repair, or servicing of construction tools, machinery, or equipment or delivering of construction materials which disturbs the occupants of a residence between the hours of 9:00 PM and 7:00 AM of the following day and construction work of any kind within 500 feet of residential land uses before 8:00 AM or 6:00 PM on any Saturday or holiday nor any time on any Sunday. LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) limits construction-generated noise within 500 feet of residential land uses to a maximum of 75 decibels (dB) at 50 feet from the source.

Construction activity would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and

presence or absence of noise attenuation barriers. Construction noise for the Project would cause a temporary increase in the ambient noise levels but would be subject to LAMC Section 112.05. Pursuant to the Project Site's location within the "HCR" Hillside Construction Regulation District, hauling and grading equipment are required to be kept in good operating condition and muffled as required by law, which would further reduce the levels of noise generated during construction. The Hillside Construction Regulations additionally limit exterior construction activities to the hours of 8:00 AM to 6:00 PM Monday through Friday with interior construction work additionally allowed between the hours of 8:00 AM to 6:00 PM on Saturdays, and limit hauling to the hours between 9:00 AM and 3:00 PM Monday through Friday. Accordingly, the Project would comply with the construction hours allowed by LAMC Section 41.40.

Based on the above, construction of the Project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local noise ordinance. Therefore, project impacts would be less than significant.

Operation

Operational noise would be generated by heating, ventilation, and air conditioning ("HVAC") and pool equipment installed at the new residence. However, the noise levels generated by this type of equipment are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing off-site residences. 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 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), which prohibits noise from HVAC equipment and pumping, filtering, or heating equipment for any pool or spa from exceeding the ambient noise level on the premises of other occupied properties by more than five dB. Thus, because the noise levels generated by the HVAC and pool equipment serving the Project would not be allowed to exceed the ambient noise level by five dB on the premises of the adjacent properties, operation of the Project would not generate a substantial increase in ambient noise levels in excess of standards established in the local noise ordinance. As such, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

Less than Significant Impact. Construction activities can generate varying degrees of vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. Unless heavy construction activities are conducted extremely close (within a few feet) to the neighboring structures, vibrations from construction activities rarely reach the levels that damage structures. Construction of the Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction of a typical single-family residential building would be from operation of a bulldozer.

Though not regulatory in nature, the Federal Transit Authority (FTA) has established vibration impact criteria for buildings and other structures, as potential building and structural damages are

the generally the foremost concern when evaluating the impacts of construction-related vibrations. For non-engineered timber and masonry buildings, such as the existing residential structures in the vicinity of the Project Site, the FTA establishes a damage threshold of 0.2 inches per second (in/sec) peak particle velocity (PPV).[89] At a distance of 25 feet from the source of vibration, a large bulldozer would generate vibration of 0.089 in/sec PPV.[90] The distance between the Project Site and the nearest structure, the vacant residence located immediately south of the Site, is approximately 15 feet. Adjusting the 25-foot reference vibration level to 15 feet results in an estimated vibration level of 1.9 in/sec PPV.[91] Accordingly, construction of the Project would not generate vibration levels that would result in structural damage to existing buildings. Therefore, impacts would be less than significant and no mitigation measures would be required.

Operation

The primary sources of vibration from the Project Site during operation would be delivery trucks and passenger vehicles. According to the FTA, delivery trucks rarely generate groundborne vibration that exceeds 70 VdB,[92] which is equivalent to approximately 0.013 in/sec PPV, which would be less than the significance threshold of 0.2 in/sec PPV for potential residential building damage. As passenger vehicles are much smaller than delivery trucks, the groundborne vibration from passenger vehicles would be lower. Furthermore, such sources are typical of residential environments and the Project does not include uses that would require a substantial number of additional delivery or passenger vehicle trips over a typical residential use or the existing neighborhood. As such, operation of the Project would not generate excessive vibration levels. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact. As discussed in response to **Checklist Question IX(e)** above, the Project Site is not located within any airport's influence area nor within two miles of an existing airport.[93] The nearest airport is the San Gabriel Valley Airport (4233 Santa Anita Avenue, El Monte), located approximately 9.8 miles to the east. Moreover, the Project Site is not located within an existing or

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89 *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, September 2018, Table 7-5: Construction Vibration Damage Criteria, page 186.*

90 *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, September 2018, Table 7-4: Vibration Source Levels for Construction Equipment, page 184.*

91 *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, September 2018, Equation 7-2, page 185.*

92 *FTA, Transit Noise and Vibration Impact Assessment Manual, 2018, page 113.*

93 *County of Los Angeles, Department of Regional Planning, Airports and Airport Influence Areas, August 2018, https://case.planning.lacounty.gov/assets/upl/project/ALUC_Airports_Aug2018_rev3.pdf, accessed December 19, 2023.*

projected noise contour associated with an airport.[94] As such, the Project would not expose people to excessive noise from airports. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

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?	☐	☐	☐	☒

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. The Project would not include commercial uses and would, therefore, not generate induce employment growth; however, it would generate additional housing and residential population. The Project Site is located within the jurisdiction of SCAG. As part of its comprehensive planning process for the Southern California region, SCAG is responsible for preparing population, employment, and housing projections for the region and its 15 subregions. The Project Site is located within the City of Los Angeles subregion. Over the current planning period (2020—2045), SCAG projects that the population of the City will increase by 837,500 people and housing within the City will increase by 426,000 dwelling units.[95] Including the ADU as a separate dwelling unit, the Project would increase the housing in the City by two dwelling units. Using a population generation rate of 3.15 residents per single-family residence,[96] and conservatively assuming that both the single-family residence and the ADU would generate a

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94 Los Angeles County, Airport Land Use Commission Site, A-NET Interactive Map, available at: https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a, accessed January 17, 2024.

95 Southern California Association of Governments, 2020 Regional Transportation Plan / Sustainable Communities Strategy, adopted September 3, 2020, Demographics and Growth Forecast Technical Report, Table 14: Jurisdiction-Level Growth Forecast, page 34.

96 City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1: Land Use and Trip Generation Base Assumptions, pages 10-11.

population of 3.15 persons, the Project would increase the residential population at the Site and in the City by seven residents.[97] As such, the Project's increase in residential population and housing would be within the increase in population projected by SCAG for the City during the regional planning period and would not result in substantial or unplanned direct population growth.

The Project would include extension of utilities infrastructure such as water lines, sewer laterals, electric power lines, and telecommunication cables; and transportation infrastructure improvements, including widening and dedication of N. Thomas Street. However, all utility extensions would serve the Project only and the proposed roadway improvements would be conducted in accordance with the development requirements of the LAMC pertaining to street access, and are designed to comply with emergency access to the Project Site.

Furthermore, the Project Site is located in a developed, urban area of the City. The residential uses proposed by the Project would be consistent with the existing uses of the surrounding area and would be compatible with allowed uses in the Northeast Los Angeles Community Plan. The Project would not require and does not propose increases or expansions of offsite utility supplies or infrastructure or extension of public roadways into undeveloped areas. Minor local upgrades and connections to offsite utilities would be required, however, all such upgrades and connections would serve to increase capacity for the Project and existing local land uses, and would not significantly increase the potential for expansive development in the local vicinity or regional area. Therefore, the Project would not result in substantial or unplanned indirect population growth.

Because the Project would not induce substantial unplanned growth directly or indirectly, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently vacant and developed. As such, the Project would not displace substantial numbers of existing people or housing and the construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

None required.

[97] *Calculated as: 2 single-family residences x 3.15 residents per single-family residence = 6.3 new residents, rounded up to 7 new residents.*

XV. PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection?

Less than Significant Impact. The City of Los Angeles Fire Department (LAFD) provides fire protection services in the City, including at the Project Site. The Project would be served by Fire Station 1 (2230 Pasadena Avenue) located approximately 1.2-roadway-miles southwest of the Site.[98] Fire Station 1 includes Truck 1, EMS Rescue 1 (ALS frontline), and Engine 201; and is capable of responding with a Light Force (Truck 1 responding with Engine 201).

Construction

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials such as wood, plastics, sawdust, coverings, and coatings to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire

[98] *City of Los Angeles Fire Department, Find Your Station, available at: https://www.lafd.org/fire-stations/station-results, accessed December 21, 2023.*

prevention and emergency response. In addition, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2022 California Building Code, the 2022 California Fire Code, Chapter 5, Article 7: Fire Protection and Prevention (Fire Code), of the LAMC, and the City's Fire Prevention and Public Safety Bureau's Requirement #07: Fire Safety at Construction Sites.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could increase response times for emergency vehicles within the Project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis and emergency access to the Project Site and surrounding properties would be maintained at all times. Furthermore, the streets surrounding the Project Site are not main arterials or emergency evacuation routes, and the techniques typically employed by emergency vehicles to clear or circumvent traffic (i.e., lights and sirens) pursuant to California Vehicle Code (CVC) Section 21806, are expected to limit the potential for significant delays in emergency response times during Project construction.

Overall, with compliance to applicable LAFD requirements and maintenance of emergency access, and due to the temporary nature of the necessary construction activities, construction of the Project would not substantially increase the demand for fire protection services or interfere with emergency access such that new or expanded fire protection services would be required. Therefore, the Project can be adequately served by fire protection services during construction.

Operation

Operational activities associated with the Project would incrementally increase demand for fire protection and emergency medical services. As discussed in response to **Checklist Question XIV(a)**, the Project would generate seven residents, which would increase the population potentially requiring fire protection services at the Project Site and within the City. However, the Project would be subject to compliance with fire protection design standards, as necessary, per the 2022 California Building Code, 2022 California Fire Code, the LAMC, and the LAFD, to ensure adequate fire protection. The City's standard conditions of approval generally require that plans for building construction include fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading subject to review and approval by the City and by LAFD.

Project operation would increase traffic in the area, which could adversely affect LAFD emergency response times. LAFD considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distances for Low Density residential land uses (which is likely the most appropriate land use category for the Project) is 1.5-mile from an LAFD fire station that houses an engine company, and 2 miles from a station that houses a truck company. If these distances are exceeded, the project in question would be required to install automatic fire sprinkler systems. As discussed above, the Project would be served primarily by Fire Station No. 1, which is located approximately 1.2-roadway-miles southwest of the Project Site and includes both an engine company and a truck company and is capable of responding with a Light Force when operating both in conjunction. As such, the Project Site is located within the maximum response

distances for an LAFD engine company and truck company. Regardless, according to the Project's plans, automatic sprinklers would be installed throughout the Project building, which reduce the severity of fire damage and provide additional time for evacuation in the interim between ignition and arrival of fire protection services.

Furthermore, pursuant to CVC Section 21806, emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response such that adequate LAFD emergency response would be maintained with implementation of the Project. LAFD apparatus are currently able to access the Project Site.[99] Additionally, the Project would widen N. Thomas Street to 20 feet adjacent to the Project Site, resulting in adjacent Site access that complies with LAFD site access requirements and City regulations. In addition, the Project would also create a hammerhead turn-around at the top of N. Thomas Street at its intersection with N. Prewett Street sized to accommodate emergency vehicle maneuvering. Emergency vehicle access to the Project Site would continue to be provided from local roadways and all improvements proposed would comply with the Fire Code, including any additional access requirements of the LAFD. LAFD reviewed the Project's plans (which have been attached in full as Appendix A of this IS/MND), including the proposed roadway widening, dedication, and hammerhead turn-around and issued an approval on July 31, 2024.[100] Based on the above, development of the Project is not anticipated to result in substantial adverse effects related to fire protection response.

In addition to response distances and times, 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. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the Project Site is detailed in response to **Checklist Question XIX(a)**. As discussed therein, the Project would be adequately served with regard to fire flow and would not result in substantial environmental effects associated with any upgrades or connections should they be required. LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Low Density Residential category require one hydrant per 150,000 square feet of land with 600-foot distances between 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential building must be within 300 feet of an approved hydrant. The Project would be required to adhere to City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Specifically, the primary duties of the LAFD Fire Development Services Unit is to conduct Fire Life Safety Plan Checks and Fire Life Safety Inspections, which aim to enforce applicable standards of the California Fire Code (Title 24, Part 9), California Code of Regulations Title 19, and the Los Angeles Fire Code (LAMC Chapter 5, Article 7). Furthermore, the LAFD Hydrants and Access Unit reviews plans to evaluate adequacy

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[99] *Personal communication between Los Angeles Fire Department Station No. 1 and Project Architect, 2022.*

[100] *City of Los Angeles Fire Department, Fire Development Services, Hydrants & Access, Approved Plans, Transaction ID Number: H23-98446, Stamped by Kurt Corral #445, July 31, 2024.*

of site access and hydrant placement. Accordingly, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or prior to the approval of a building permit. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit.

Overall, given the Project's anticipated growth, the availability and close proximity of existing fire protection services, and the Project's planned on-site fire protection design features consistent with the applicable regulatory requirements of the 2022 California Building Code, 2022 California Fire Code, the LAMC, and the LAFD, the Project would not be expected to be beyond the scope of available fire services. Accordingly, operation of the Project would not substantially increase the demand for fire protection services or interfere with emergency access such that new or expanded fire protection services would be required.

Summary

Based on the above, the Project can be adequately served by fire protection services during construction and operation. As such, the Project would not 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 fire protection. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

b. Police protection?

Less than Significant Impact. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Hollenbeck Community Police Station (Hollenbeck Station), which is located approximately 3.3 roadway-miles south of the Project Site.[101] Hollenbeck Station is under the Central Bureau and serves a population of approximately 200,000 people. Hollenbeck Station's boundaries cover 15.2 square miles and encompasses the communities of El Sereno, Lincoln Heights, and Boyle Heights.[102]

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting

[101] *Los Angeles Police Department, Community Police Station Address Directory, available at: https://www.lapdonline.org/find-your-local-police-station/, accessed December 21, 2023.*

[102] *Los Angeles Police Department, Hollenbeck Community Police Station, available at: https://www.lapdonline.org/lapd-contact/central-bureau/hollenbeck-community-police-station/, accessed December 21, 2023.*

temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. As previously discussed, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. All temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Such events would be coordinated with neighboring construction projects, as necessary. Furthermore, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC.

Therefore, with compliance to applicable City regulatory compliance measures and maintenance of emergency access, and due to the temporary nature of the necessary construction activities, construction of the Project would not substantially increase the demand for police protection services or interfere with emergency access such that new or expanded police protection services would be required. As such, the Project can be adequately served by police protection services during construction.

Operation

Operational activities associated with the Project would incrementally increase demand for police protection services. As discussed in response to **Checklist Question XIV(a)**, the Project would generate seven residents, which would increase the population potentially requiring police protection at the Project Site and within the City. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons could be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, the Project would include security features such as night lighting to illuminate the home entrances, driveway, and parking area; and a private garage for indoor parking. In addition, the Project would increase the continuous (nighttime and daytime) presence of residents on the Project Site, decreasing the opportunity for suspicious activity at the currently vacant Project Site. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which could potentially cause environmental impacts.

Patrol routes in the area currently include the Project vicinity and would continue to do so in a similar manner as under existing conditions. To ensure that police protection considerations are incorporated into the Project design, prior to the issuance of a building permit for the Project, the LAPD would be provided the opportunity to review and comment upon improvement plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. The Project would also introduce additional traffic in the Project vicinity, which could potentially affect police response to the Project Site and surrounding properties. However, as discussed under **Checklist Section XVII, Transportation**, the Project would result in less-than-

significant traffic impacts. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806. Accordingly, the Project would not cause a substantial increase in emergency response times due to traffic congestion. In addition, the Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Overall, given the availability and close proximity of existing police protection services and the Project's planned on-site safety features, the Project would not be expected to be beyond the scope of available police services. Accordingly, operation of the Project would not substantially increase the demand for police protection services or interfere with emergency access such that new or expanded police protection services would be required.

Summary

Based on the above, the Project would not 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 police protection. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c. Schools?

Less than Significant Impact. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. LAUSD is the nation's second-largest school district, operating 1,438 schools and centers serving 563,083 students and employing 74,741 employees in 710 square-miles.[103] The following are assigned resident LAUSD schools currently serving the Project Site:

- Gates Street Elementary, located at 3333 Manitou Avenue; and
- Florence Nightingale Middle School, located at 3311 N Figueroa Street.

With regard to high school, the Project area is located within the Northeast Zone of Choice, which allows high school students living within the zone to choose from one of two area schools offering specialty educational options. The schools available for high school students residing in the Project area include the following:

- Woodrow Wilson Senior High, located at 4500 Multnomah Street; and
- Abraham Lincoln Senior High, located at 3501 N. Broadway.

[103] *Los Angeles unified School District, Fingertip Facts, 2023-24, https://www.lausd.org/site/handlers/filedownload.ashx?moduleinstanceid=81764&dataid=135710&FileName=Fingertip%20Facts%202023-2024.pdf, accessed December 21, 2023.*

It should be noted that state-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school. Additionally, to reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). 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 address 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. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other state or local law.

The Los Angeles Unified School District (LAUSD) prepares Developer Fee Justification Studies for to support the school district's levy of the fees authorized by Section 17620 of the California Education Code, with the most recent study prepared in March 2022.[104] The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD. Therefore, as payment of appropriate school fees to LAUSD is required by law and considered to fully address impacts, impacts would be less than significant, and the Project would be adequately served by school facilities. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

d. Parks?

Less than Significant Impact. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. The following LADRP parks are located within a one-mile radius of the Project Site:[105]

- Greayer's Oak Mini Park, located at 3711 N. Figueroa Street;
- East Los Angeles Park, located at 2500 N. Eastlake Avenue;
- Lacy Street Neighborhood Park, located at Avenue 26 and Lacy Street;
- Lincoln Park, located at 3501 Valley Boulevard; and
- Lincoln Park Skate Park, located at 3501 Valley Boulevard.

[104] *Schoolworks, Inc., 2022 Developer Fee Justification Study, Los Angeles Unified School District, March 2022.*

[105] *City of Los Angeles, Department of Recreation and Parks, Discover Facilities, available at: https://www.laparks.org/discover-facilities, accessed December 21, 2023.*

As discussed in response to **Checklist Section XVI, Recreation**, the additional seven residents that would be generated by the Project would not be expected to increase the use of parks to a degree that would cause deterioration of existing facilities or necessitate the construction of additional or expansion of existing facilities. Additionally, the Project would include private, on-site recreation facilities, including a jacuzzi, pool, and two deck/lounge areas, which would reduce demand on the City's existing park system by Project residents. Furthermore, any impact on parks would be reduced to a less than significant level through the payment of park fees as required by LAMC Section 12.33. The LADRP would collect these park fees based on their current rate and fee schedule. The City requires park fees to reduce the park- and open space-related impacts of new residential development projects, and requires these fees to be paid before a Certificate of Occupancy can be issued. Therefore, through provision of onsite recreation facilities and payment of required park fees, impacts to parks would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

e. Other public facilities?

Less than Significant Impact. Los Angeles Public Library (LAPL) provides library services to the City. The nearest LAPL libraries to the Project Site include:[106]

- Lincoln Heights Branch Library, located at 2530 Workman Street;
- Cyprus Park Branch Library, located at 1150 Cyprus Avenue;
- Malabar Branch Library, located at 2801 Wabash Avenue;
- Chinatown Branch Library, located at 639 N Hill Street; and
- El Sereno Branch Library, located at 5226 S. Huntington Drive.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03-percent of the assessed value of all property in the City, and incrementally increase LAPL's financial responsibility until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes.[107] Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[108]

Under the Project, LAPL's existing service level would be maintained without an additional library or alterations to the existing libraries. The demand for library materials could be accommodated by the over six million books, audiobooks, periodicals, DVDs, and CDs throughout the LAPL system. The LAPL also offers many other services, including but not limited to, visual collections,

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[106] *City of Los Angeles, Los Angeles Public Library, Locations and Hours, available at: https://www.lapl.org/branches, accessed December 21, 2023.*

[107] *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L.*

[108] *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf. Accessed January 2023.*

e-media, web resources, research guides, and government document locator. An increase of seven residents in the Project area would not generate additional demand for library services of a level that would create substantial capacity or service level problems that would require the provision of new or expanded public facilities in order to maintain an acceptable level of service. Therefore, impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

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?	☐	☐	☒	☐

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?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. As detailed in response to **Checklist Question XV(d)**, the Project would include its own private, on-site recreational facilities, which would reduce the demand for off-site recreational facilities by the Project's residents. In addition, the Project would be subject to the open space development fees required by LAMC Section 12.33. As such, the Project's incremental increase of seven residents would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur nor would it require the construction or expansion of such facilities which might have an adverse physical effect on the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

Less than Significant Impact.

Screening

The City of Los Angeles aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. In their Transportation Assessment Guidelines (TAG),[109] the Los Angeles Department of Transportation (LADOT) provides projects criteria to identify which projects must check for consistency with major City plans and policies and provides updated references that should be consulted to evaluate how proposed projects and plans relate to adopted City projects and plans. The TAG establishes that if a project requires a discretionary action, and the answer is "yes" to any of the following questions, further analysis is required:

- Does the project require a discretionary action that requires the decisions maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?
- Is the project known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety?

[109] *City of Los Angeles, Department of Transportation, Transportation Assessment Guidelines, August 2022.*

- Is the project required to or proposing to make any voluntary modifications to the public right-of-way (i.e., dedications and/or improvements in the right-of-way, reconfigurations of curb line, etc.)?

Although the Project is not known to directly conflict with a transportation plan, policy, or program adopted to support multimodal transportation options or public safety and the answer to this question is "no," the Project does require a discretionary determination that the Project conforms to the purpose, intent, and provisions of the General Plan and would include required modifications to the public right-of-way (dedication and widening of N. Thomas Street adjacent to the Project Site), and the answer to these two questions is "yes." As such, further analysis of the Project's consistency with major City plans and policies is required.

Analysis

Attachment D of the TAG outlines a streamlined approach to evaluate a project's consistency with the most relevant plans, policies, and programs addressing the City's circulation system and includes specific questions for identifying potential conflicts with specific Mobility Plan 2035 policies pertaining to A) street dedications and standard roadway dimensions for certain street designations; B) the public right-of-way with project-initiated changes; C) network access; and D) parking supply and transportation demand management; as well as with E) the greenhouse gas reduction targets of SCAG's RTP/SCS (consistency with regional plans).

A. Mobility Plan 2035 PROW Classification Standards for Dedications and Improvements

A.1 Does the project include additions or new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone?

No. The Project Site is not located along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone.

A.2 If A.1 is yes, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation.

Not applicable. The answer to A.1 is "no."

A.3 If A.2 is yes, is the project making the dedications and improvements as necessary to meet the designated dimensions of the fronting street (Boulevard I, and II, or Avenue I, II, or III)?

Not applicable. The answer to A.1 is "no."

A.4 If the answer to A.3. is NO, is the project applicant asking to waive from the dedication standards?

Not applicable. The answer to A.3 is "not applicable."

Attachment D of the TAG states that '[i]f the answer is to A.1 or A.2 is NO, or to A.1, A.2 and A.3. is YES, then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions." The Project's answer to A.1 is A.2 are "no." Therefore, the Project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard Roadway Dimensions.

B. Mobility Plan 2035 PROW Policy Alignment with Project-Initiated Changes

B.1 Does the project propose, above and beyond any PROW changes needed to comply with Section 12.37 of the LAMC as discussed in Section II.A, physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?

Yes. The Project would include a new driveway and vehicle access and would make required modifications (widening and dedication) to the public right-of-way (N. Thomas Street).

B.2 Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT's Driveway Design Guidelines…?

No. The Project would not add new driveways along a street designated as an Avenue or a Boulevard.

Because the answer to B.1 is "yes," additional analysis must be provided. Specifically, the following questions must be answered:

B.2.1 Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?

No. The Project Site is not located along a Transit Enhanced Network, a Bicycle Lane Network, a Pedestrian Enhanced Network, or a Neighborhood Enhanced Network, or within the service area of Metro Bike Share.

B.2.2 Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?

No. The Project's roadway improvements would not preclude the City from advancing the safety of vulnerable roadway users.

Attachment D of the TAG states that '[i]f either of the answers to both B.2.1 or B.2.2 are NO, then the project would not be shown to conflict with plans or policies that govern the Public Right-of-Way. The Project's answer to both B.2.1 and B.2.2 is "no." Therefore, the Project would not conflict with plans or policies that govern the Public Right-of-Way.

C. Network Access

C.1.1 Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?

No. The Project does not propose to vacate or otherwise restrict public access to a street, alley, or public staircase.

C.1.2 If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley, or stairway?

Not applicable. The answer to C.1.1 is "no."

C.2.1 Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?

No. The Project Site is not located adjacent to an existing cul-de-sac nor would it create a cul-de-sac.

C.2.2 If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network.

Not applicable. The answer to C.2.2 is "no."

Attachment D of the TAG states that "[i]f the answers to either C.1.2 or C.2.2 are YES, then the project would not conflict with a plan or policies that ensures access for all modes of travel." Questions C.1.2 and C.2.2 are not applicable to the Project. Therefore, the Project would not conflict with a plan or policies that ensures access for all modes of travel.

D. Parking Supply and Transportation Demand Management

D.1 Would the project propose a supply of onsite parking that exceeds the baseline amount as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails?

No. The Project does not propose a supply of onsite parking that exceeds the baseline amount as required in the LAMC.

D.2 If the answer to D.1 is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g. parking cash-out), or for residential properties, unbundle the supply from the lease or sale of residential units?

Not applicable. The answer to D.1 is "no."

D.3. Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC?

Yes. Section 12.21 A.16 off the LAMC does not require the Project to provide on- or off-site bicycle parking spaces.

D.4. Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor?

No. The Project would not include more than 25,000 square feet of gross floor area construction of new non-residential gross floor.

D.5 If the answer to D.4. is YES, does the project comply with the City's TDM Ordinance in Section 12.26 J of the LAMC?

Not applicable. The answer to D.4 is "no."

Attachment D of the TAG states that "[i]f the answer to D.2 is NO the project may conflict with parking management policies. Question D.2 is not applicable to the Project. Therefore, the Project would not conflict with parking management policies. Attachment D of the TAG also states that "[i]f the answer to D.3 or D.5 is NO the project conflicts with LAMC code requirements of bicycle parking and TDM measures. The Project's answer to D.3 is yes and Question D.5 is not applicable to the Project. Therefore, the Project would not conflict with LAMC code requirements of bicycle parking and TDM measures.

E. Consistency with Regional Plans

E.1 Does the Project or Plan apply one the City's efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in Section 2.2.3 of the TAG?

Yes. The Project was evaluated for VMT impacts pursuant to the TAG's criteria as further detailed below in response to **Checklist Question XVII(b)**.

E.2 If the Answer to E.1 is YES, does the Project or Plan result in a significant VMT impact?

No. The Project was determined to have less-than-significant impacts with regard to VMT.

E.3 If the Answer to E.1 is NO, does the Project result in a net increase in VMT?

Not applicable. The Project's answer to E.1 is "yes."

Attachment D of the TAG states that "[i]f the Answer to E.2 or E.3 is NO, then the Project or Plan is shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS." The Project's answer to E.2 is "no" and Question E.3 is not applicable to the Project. Therefore, the Project would not conflict with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

Summary

Based on the above, the Project would not conflict with specific Mobility Plan 2035 policies pertaining to A) street dedications and standard roadway dimensions for certain street designations; B) the public right-of-way with project-initiated changes; C) network access; and D) parking supply and transportation demand management; as well as with E) the greenhouse gas reduction targets of SCAG's RTP/SCS (consistency with regional plans).

Therefore, the Project would not conflict with the most relevant plans, policies, and programs addressing the City's circulation system. As such, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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

No Impact.

Screening

For land use projects, the intent of this Checklist Question is to assess whether a land use project or plan causes substantial vehicle miles traveled. In their TAG, the LADOT has developed the following screening and impact criteria to address this question:

If a project requires discretionary action (such as the proposed Project) and the answer is "no" to either of the criteria below, further analysis with regard to this Checklist Question is not required and a "no impact" determination can be made:

- **T-2.1-1**: Would the land use project generate a net increase of 250 or more daily vehicle trips?

  Based on the land use and trip generation base assumption of 9.52 daily vehicle trips per single-family residential dwelling unit contained in the City's VMT Calculator, and including the ADU as a separate residential dwelling unit, the Project would generate 20 daily vehicle trips.[110] Accordingly, the Project would not generate a net increase of 250 or more daily vehicle trips and the answer to this criterion is "no."

- **T-2.1-2**: Would the project generate a net increase in daily VMT?

  The Project Site is currently vacant and generates no daily VMT. Accordingly, the Project would generate a net increase in daily VMT and the answer to this criterion is "yes."

Independent of the above criteria, additional criteria are provided with regard to projects that include retail uses and that would replace an existing number of residential units with a smaller number of residential units; however, the Project would not include retail and would not replace existing housing. Therefore, the additional criteria do not apply to the Project. Although the Project would generate a net increase in daily VMT and the answer to criterion T-2.1-2 is "yes," because the TAG establishes that further analysis is not required if the answer to either criterion is "no," and because the Project would not generate a net increase of 250 or more daily vehicle trips and the answer to criterion T-2.1-1 is "no," no further analysis with regard to **Checklist Question XVII(b)** is required and a no impact determination can be made.

Conclusion

Based on the above, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur and no mitigation would be required.

Mitigation Measures

None required.

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

Less than Significant Impact.

Screening

Geometric Design Features

The TAG includes the following screening and impact criteria to address this Checklist Question:

If a project requires discretionary action (such as the proposed Project) and the answer is "yes" to either of the following questions, further analysis with regard to this Checklist Question is required:

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[110] *Based on a trip generation rate of 9.52 trips per day per single-family residence. 2 residences x 9.52 trips per residence = 19.04 rounded up to 20. Source: City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1: Land Use and Trip generation Base Assumptions, page 10.*

- Is the project proposing new driveways, or introducing new vehicle access to the property from the public right-of-way?

- Is the project proposing to make any voluntary or required modifications to the public right-of-way (i.e., street dedications, reconfiguration of curb line, etc.)?

The Project would include new a new driveway and vehicle access and would make required modifications (widening and dedication) to the public right-of-way (N. Thomas Street). As such, the answer to both of the above questions is "yes," and further analysis of the Project's potential to increase hazards due to geometric design features is required.

Freeway Off-Ramp Queuing

In addition to the screening questions above, the TAG includes the following questions to determine potential impacts due to queuing from a freeway off-ramp that could lead to unsafe differential travel speeds:

If the answer is "yes" to all of the following questions, further analysis is required:

- Does the land use project involve a discretionary action that would be under review by the Department of City Planning?

- Would the land use project generate a net increase of 250 or more daily vehicle trips?

- Would the land use project add 25 or more trips to any off ramp in either the morning or afternoon peak hour?

As previously detailed, the Project would generate 20 daily vehicle trips, which would not have the potential to add 25 or more trips to any off ramp in either the morning or afternoon peak hour. Therefore, although the Project requires discretionary action by the City and the answer to the first question is "yes," because the TAG requires a "yes" answer to all three of the above questions in order to require further analysis of impacts to freeway off ramps, and because the answer to the other two questions is "no," no further analysis of the Project's impacts to freeway off ramps is required.

Analysis

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. According to the TAG, such conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections.

Vehicular access to the Project Site would be via a driveway into a two-car, attached garage and a second driveway into a separate, uncovered parking area. As previously shown on **Figure 3-3**, the Project's driveways would be located in the southeastern corner of the Site off of N. Thomas Street. The Project would widen N. Thomas Street and include a three-foot dedication adjacent to the Project Site, which would improve vehicular access to the Site, increase visibility for turning movements, and prevent slowing or queuing of vehicles accessing the Project Site. The Project's

driveways would also conform to the City's applicable emergency access requirements as set forth by the Department of Transportation (LADOT) and the LAFD. Additionally, the Project design would be reviewed by the Department of City Planning, LADBS, and the LAFD during the City's plan review process to ensure all applicable requirements are met. No bicycle or pedestrian facilities are located adjacent to the Site or anywhere along N. Thomas Street. The roadway network in the vicinity of the Project Site, including N. Thomas Street, are located in a low density residential area and is not busy or congested. Furthermore, the Project Site is located at the end of N. Thomas Street and no through access beyond the Site is provided. Accordingly, the Project would not result in vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts or operational delays.

Conclusion

Based on the above, in accordance with the guidance provided in the City's TAG, the Project would not substantially increase hazards due to geometric design feature. Additionally, the Project proposes a residential land use compatible with the underlying land use designation and zoning of the Site and with the existing development in the vicinity; no incompatible uses, such as farm or industrial equipment would be introduced. As such, impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

d) Result in inadequate emergency access?

Less than Significant Impact. Consistent with the requirements of the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403), construction materials and equipment would not be permitted to be stored in the public right-of-way in any manner that reduces roadway clearance to less than 20-feet in width and that any storage of construction materials and equipment on public property would require a street use permit from the Bureau of Street Services. These requirements and prohibitions have been incorporated into the Project's Construction Traffic Management Plan, which states that "[e]mergency access to the [Project Site] and adjacent areas shall be kept clear and unobstructed during all phases of construction" and "[a]t no time shall staged vehicles or construction materials impede roadway access by residents or emergency vehicles." [111] Accordingly, adequate emergency access to the Site and surroundings would be maintained during construction.

With regards to operation, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. Emergency vehicle access to the Project Site would continue to be provided from N. Thomas Street. As presented in **Appendix F.3**, the slope of N. Thomas Street varies between 1.1 percent and 54.2 percent along five selected street segments of Thomas Street, approximately between Alta Street to just north of the Project Site. The Project's street improvements will be subject to review and approval by the BOE during the "B" Permit process. A "B" Permit is required for extensive public work improvements. The Project would improve N. Thomas Street adjacent to the Site through widening to 20 feet consistent with the requirements of LAMC Section

[111] *Traffic Associates, Inc., Construction Traffic Management Plan, 2824 & 2830 Prewett St, Lincoln Heights, CA 90031, July 9, 2024. The plan was reviewed and stamped approved by LADOT staff on August 8, 2024.*

12.21.C.10(i)(3), and would include a three-foot dedication, which would improve emergency access along N. Thomas Street in the vicinity of the Project Site. In addition, the Project would also create a hammerhead turn-around at the top of N. Thomas Street at its intersection with N. Prewett Street sized to accommodate emergency vehicle maneuvering as previously shown on **Figure 3-5**. As discussed in **Checklist Section XV, Public Services**, the Project's proposed design, including ingress/egress and dedications and improvements to the public right-of-way is subject to review and approval by the BOE, LADOT, and LAFD. LAFD reviewed the Project's plans, including the hammerhead turn-around and issued an approval on July 31, 2024.[112] The Project would also introduce additional traffic in the Project vicinity, which could potentially affect emergency response to the Project Site and surrounding properties. However, as discussed above, additional Project-related trips would be minimal and impacts associated with traffic volume would be less than significant. Furthermore, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code Section 21806. The Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site.

Based on the above, emergency access to the Project Site and surrounding uses would be maintained at all times. As such, the Project would not result in inadequate emergency access. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐

[112] *City of Los Angeles Fire Department, Fire Development Services, Hydrants & Access, Approved Plans, Transaction ID Number: H23-98446, Stamped by Kurt Corral #445, July 31, 2024.*

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category: tribal cultural resources. AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a Project that may have a significant effect on the environment" (PRC Section 21084.2). AB 52 further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed Project." Native American tribes to be included in the process are those that have requested notice of Projects proposed within the jurisdiction of the lead agency. As specified in AB 52, a lead agency must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. The Tribe must respond within 30 days of the City's AB 52 notice.

AB 52 Consultation

On October 25, 2023, an informational letter was mailed to a total of 11 California Native American tribes known to have resources in the Project area and requesting any information regarding resources that may exist on or near the Project Site. On October 31, 2023, the City received a response from the Gabrieleno Band of Mission Indians – Kizh Nation (the "Tribe") requesting consultation pursuant to AB 52. Consultation began on November 21, 2023. The Tribe provided substantial evidence of tribal activity in the area, all of which is confidential in nature, and it has been determined that there is potential for tribal cultural resources to exist at the Project Site and appropriate mitigation is required to avoid significant impacts. On September 19, 2024, the Tribe and staff from the City acknowledged conclusion of consultation pursuant to AB 52 for the Project and agreed to apply agreed upon mitigation for construction monitoring and treatment of any resources potentially discovered at the Project Site.

The following analysis of potential tribal cultural resources impacts of the Project is based, in part, on the City's consultation with the Gabrieleno Band of Mission Indians – Kizh Nation and the agreed upon mitigation measures, as well as searches of the SCCIS's CHRIS database[113] and the Native American Heritage Commission (NAHC)'s Sacred Lands File (SLF).[114] The results of the CHRIS search and SLF search are included as **Appendix C** and **Appendix G**, respectively, to this IS/MND.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant with Mitigation Incorporated. As detailed in **Checklist Section V, Cultural Resources**, the Project Site does is not listed and does not appear eligible for listing in the California Register of Historical Resources or in a local register of historical resources,[115] and a review of the CHRIS database did not identify any previously recorded cultural resources at the Project Site.[116] In addition, based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.[117]

However, a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) was positive for sacred lands or resources important to Native Americans within the vicinity of the Project Site.[118] Accordingly, and pursuant to PRC 21084.2, a project site that is identified as positive on the Sacred Lands File may have an effect that may cause a substantial

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[113] *South Central Coastal Information Center, California Historical Resources Information System, Records Search Results for 2824-2830 N. Prewett Street, Los Angeles, SCCIC File#: 25612.11692, February 15, 2024.*

[114] *Native American Heritage Commission, Letter Re: 2830 N Prewett Street Project, Los Angeles County, January 3, 2024.*

[115] *City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, available at: http://www.historicplacesla.org/map, accessed December 15, 2023.*

[116] *South Central Coastal Information Center, California Historical Resources Information System, Records Search Results for 2824-2830 N. Prewett Street, Los Angeles, SCCIC File#: 25612.11692, February 15, 2024.*

[117] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.*

[118] *Native American Heritage Commission, Letter Re: 2830 N Prewett Street Project, Los Angeles County, January 3, 2024.*

adverse change in the significance of a tribal cultural resource, and therefore may have a significant effect on the environment. In addition, as a result of evidence provided by the Gabrieleno Band of Mission Indians – Kizh Nation as part of AB 52 consultation with the City, it was determined that there is potential for tribal cultural resources to exist at the Project Site and mitigation would be required to avoid potentially significant impacts to such resources. Pursuant to PRC Section 21080.3.2, through the AB 52 consultation process, the City and the California Native American tribes may agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource. As such, mitigation measure **MM TCR-1** has been included for the Project and require the presence of a Native American monitor from and approved by the Tribe at the Project Site during all ground-disturbance activities, Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities, and appropriate avoidance, evaluation, and treatment of any and all tribal cultural resources, human remains and funerary objects potentially inadvertently discovered at the Project Site.

Compliance with mitigation measure **MM TCR-1** would ensure any found tribal cultural resources are treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 21083.2. As such, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, impacts would be less than significant with mitigation measure **MM TCR-1**.

With regard to cumulative impacts, future development of vacant parcels in the nearby vicinity to the east along N. Thomas Street could cause a substantial adverse change in the significance of a tribal cultural resource, and therefore may have a significant effect on the environment. At this time, there are no proposed projects further east along N. Thomas Street but future projects would be evaluated on a case-by-case basis for development-specific environmental impacts. Each project will be subject to CEQA analysis and mitigation, if required. These future projects would also be required to demonstrate consistency with underlying land use plans and zoning, as well as with applicable regulations, requirements, and policies with regard to residential development. In the event that potentially significant impacts are identified for such future development, they would be required to address such impacts through project design features or mitigation to the satisfaction of the City.

Mitigation Measures

MM TCR-1 **Monitor Retention**. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work directly adjacent or related to the Project), the Applicant, or its successor, shall retain a qualified tribal monitor(s) from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. The Applicant, or its successor, and the tribal monitor(s) shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity,

or the issuance of any permit necessary to commence a Ground Disturbing Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the tribal monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the tribal monitor(s). The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site, a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant and/or the City upon request to the Tribe(s). If any Project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribe(s) by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days’ notice (if possible) shall be submitted to the Tribe(s) by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe(s)provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any

Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the tribal monitor(s), until the potential "tribal cultural resources" are properly assessed and addressed by the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the tribal monitor(s)) until the find can be assessed by the tribal monitor(s).

2. If the tribal monitor(s) determine the resources are Native American in origin, the Tribe(s) will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe's reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

3. The Applicant, or its successor, shall implement the Tribe's recommendations if the tribal monitor(s), conclude that the Tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the Tribe(s), the tribal monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state, or local law, rule, or regulation.

5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor(s) and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the City of Los Angeles Department of City Planning, Central Project Planning Division, the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be

excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

8. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(d)(2), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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.

Water Facilities

The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes 115 storage tanks and reservoirs, 84 pump stations, 60,988 fire hydrants, 7,336 miles of distribution mains, and a total storage capacity of 323,820 acre-feet.[119] 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.[120] The Project area is served by existing water distribution mains beneath the adjacent streets.

As detailed below under the discussion of water supply, implementation of Project would be within the growth projections for the LADWP service area and, therefore, within water supply demand projections, which LADWP anticipates having adequate supplies for through 2045 under normal, dry, and multiple dry year conditions, including during drought conditions over the next 5-years.[121] Therefore, LADWP would be able to adequately serve the Project's water demand without constructing new or expanding existing water supply infrastructure, such as reservoirs, treatment plants, pump stations, or water mains, beyond what has already been planned for and the environmental impacts of evaluated as part of LADWP's long-range planning efforts. The construction of new Project-serving water delivery infrastructure, such as service laterals and meters, and connections to existing off-site water mains would be required. Impacts from such construction activities are part of typical site development and would not be substantial based on

[119] *Los Angeles Department of Water and Power Website, About Us, Water Facts & Figures, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?, accessed December 26, 2023.*

[120] *LADWP, 2021-2022 Briefing Book, 2022.*

[121] *City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-19, website: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf, accessed December 26, 2023.*

their temporary and localized nature both on-site and within existing rights-of-way or public easements that have been previously disturbed. The Project would be required to coordinate connections to the public water main with the LADWP, which would avoid impacts related to service disruptions and the Project's plans would be subject to the review and approval of City as part of the normal building permit process, which would avoid impacts related to pressure or capacity deficiencies.

In addition to supplying water for domestic uses, LADWP also supplies water for fire protection services. The City of Los Angeles Fire Department (LAFD) and LAMC Section 57.507 require a water flow of 2,000 gallons per minute (gpm) flowing from three hydrants simultaneously for low-density residential. The specific fire flow rate required for the Project would be determined by the City and LAFD as part of normal plan check consistent with the requirements contained within Section 57.507.3.1 of the LAMC. In addition, the Project would install an automatic fire sprinkler system throughout the building. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. If water main or infrastructure upgrades are required to serve the Project, the Project Applicant would be required to pay for such upgrades, which the Project Applicant or LADWP would construct. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place, as is standard practice. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; (2) replacement of the water mains would be within previously-disturbed, public rights-of-way; and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, impacts associated with construction or expansion of water facilities would be less than significant and no mitigation would be required.

Wastewater Facilities

Collection and Conveyance Infrastructure

The City's Bureau of Sanitation (LASAN) provides sewer service to the Project area. The Project would be required to coordinate with LASAN to determine adequate sewer capacity pursuant to LAMC Section 64.15. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Detailed gauging and evaluation would be required as part of the building permit process to identify a specific sewer connection point. If the public sewer lacks sufficient capacity, then the developer would be required, at their own cost, to build sewer lines to a point in the sewer system with sufficient capacity in accordance with standard City procedures. A final approval for sewer capacity and connection permit would be made at the time. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation in accordance with all City permitting requirements, which would be a standard, temporary action and would not result in any adverse environmental effects. Any off-site work would be performed in consultation and under the approval of LASAN. Therefore, impacts associated with construction or expansion of wastewater facilities would be less than significant and no mitigation would be required.

Treatment Facilities

Following on-site collection and conveyance through the local off-site infrastructure, sewage from the Project would ultimately be conveyed to the Hyperion Water Reclamation Plant (HWRP). The HWRP treats an average daily flow of 275 million gallons per day (mgd) in dry weather. 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 peak wet weather flow of 800 mgd.[122] This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. The Project's proposed development of a single-family residence and attached ADU would be expected to represent an extremely negligible portion of the remaining daily capacity at the HWRP. In addition, the Project would be required to adhere to the water conservation requirements of LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, which would have the secondary effect of reducing wastewater generation. Therefore, the Project would not require construction or expansion of wastewater treatment facilities. No impacts would occur and no mitigation would be required.

Stormwater Drainage Facilities

Stormwater at the Project Site currently sheet flows down the existing grade toward the southwest. There are no existing underground stormwater drainage facilities located in the surrounding streets. As detailed in response to **Checklist Question X(c)**, the Project would direct stormwater flows from impervious surfaces, such as roofs and decks into flow-through planter boxes. These stormwater management features would be constructed entirely onsite and would be sized to accommodate the anticipated stormwater flow. Such features are considered part of the Project and are included on plans to be submitted for review and approval by the City during plan check. Standard construction and building permit plan check processes would ensure that the construction of new stormwater drainage facilities would not result in significant environmental effects. Accordingly, impacts to stormwater drainage facilities would be less than significant and no mitigation measures would be required.

Electric Power Facilities

The LADWP currently owns and operates four natural gas-fired generating stations located within the Los Angeles Basin: the Harbor Generating Station, located near the Port of Los Angeles; the Haynes Generating Station, located in Seal Beach; Scattergood Generating Station, located near Los Angeles International Airport; and Valley Generating Station, located in the San Fernando Valley. Also owned and operated by LADWP is the Castaic Power Plant, a pumped-storage hydroelectric generation facility located in Castaic, California, and has contracts for a portion of the generating capacity from: the Intermountain Power Project, a coal-fired power plant located in Delta, Utah; Hoover Dam hydroelectric power plant in Nevada, and the Pal Verde Generating Station, a nuclear power plant located in Arizona. The LADWP also owns or has power purchase agreements for: several renewable energy generating facilities including several solar, wind, and small hydroelectric facilities in Owens Valley; wind facilities located in Utah, New Mexico, Oregon,

[122] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, available at: https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp, accessed December 26, 2023.*

Wyoming, and Washington State; and geothermal and solar facilities in California and Nevada.[123] LADWP delivers electricity to customers via 4,040 miles of overhead transmission circuits, 135 miles of underground transmission circuits, 3,801 miles of underground distribution cables, 7,266 miles of overhead distribution lines, 130,703 distribution transformers, and 300,884 distribution utility poles.[124] The Project area currently receives electricity via overhead distribution cables.

As discussed in response to **Checklist Question VI(a)**, the Project would represent a negligible percentage of LADWP's projected electrical supplies. Therefore, new or expanded electrical generation or transmission infrastructure would not be required. Furthermore, LADWP routinely plans capacity additions and changes at existing and new facilities as needed to supply area load based on consideration of projects within the City that may affect energy demand, including new development, such as the Project. Accordingly, the Project's electrical consumption would be part of the total load growth forecast for the LADWP service area and accounted for in the planned growth of the City's power system. In addition, as there are already electrical power lines in the vicinity, new or expanded local distribution and delivery infrastructure would not be required, nor would capacity-enhancing alterations to existing facilities be required from Project implementation. The installation of any on-site electrical equipment (wiring, meters, etc.) would be normal process of typical site development and would not result in any adverse environmental effects based on its temporary and localized nature both on-site and within existing rights-of-way or public easements that have been previously disturbed. Coordination with LADWP prior to connection to the local system would be required and would avoid service disruption to existing users in the vicinity. Therefore, impacts associated with construction or expansion of electrical power facilities would be less than significant and no mitigation would be required.

Natural Gas Facilities

Construction-related activities, including grading and excavation, could encroach on existing natural gas facilities. However, prior to ground-disturbing activities associated with construction, subsurface surveys would be conducted to confirm the location of all existing subsurface infrastructure, including gas lines, and their locations would be clearly marked in order to avoid disturbance of existing infrastructure. Consistent with the mandatory requirements for residential development established in Section 99.04.106.8.1 of the LAMC, the energy demands of the Project would be supplied entirely by electricity. Therefore, the relocation or construction of new or expanded natural gas facilities would not be required and are not proposed by the Project. Accordingly, no impacts to natural gas facilities would occur and no mitigation would be required.

Telecommunication Facilities

There are no active telecommunication facilities within the Project Site. However, before construction begins, the Project would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the applicant and/or the successor on an ongoing basis. Upgrades to

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[123] *Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, pages 1-8 and 1-9.*

[124] *Los Angeles Department of Water and Power, 2022 Power Strategic Long-Term Resource Plan, page 1-7.*

existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts associated with construction or expansion of telecommunication facilities would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets, low-flow showerheads and faucets, high-efficiency clothes washers, and high-efficiency dish washers. All fixtures would be required to meet applicable flush volumes and flow rates. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. In addition, consistent with the requirements of LAMC Section 99.04.305.2, the Project has been designed to be greywater ready.

LADWP's *2020 Urban Water Management Plan* (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage in the 1970s.[125] The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in **Table XIX-1, LADWP Water Supply and Demand Projections**.

Table XIX-1
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000

[125] *City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3.*

Table XIX-1
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Average Years						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

AFY = acre-feet per year
1 Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.

As shown in **Table XIX-1**, annual water demand within the City is projected to increase over the planning period by between 67,900 AFY and 72,000 AFY. The water demand associated with a single-family residence and attached ADU would be expected to represent an extremely negligible portion of this projected increase, as well as total water supplies. Moreover, as also shown in **Table XIX-1**, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions. As detailed in **Checklist Section XIV, Population and Housing**, the Project's population growth would be consistent with the forecasted population growth for the City by 2045. Accordingly, the Project's estimated water demand has been accounted for within LADWP's projections and would not result in an exceedance of the water demand estimates of the 2020 UWMP. As such, the Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple-dry years. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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. As detailed above, the Project's proposed development of a single-family residence and attached ADU would be expected to represent an extremely negligible portion of the remaining daily capacity at the HWRP. As such, the Project would result in a

determination by the wastewater treatment provider that it has adequate capacity to serve the Project's projected demand in addition to existing commitments. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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. LASAN provides waste collection services to single-family developments; however, private haulers provide waste collection services for C&D debris and general construction waste. Waste disposal sites (i.e., landfills) are operated by the County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints.

Construction waste is typically disposed of at inert landfills, which are facilities that accept materials such as soil, concrete, asphalt, and other construction and demolition (C&D) debris. As of 2020, the Azusa Land Reclamation facility, located approximately 16 miles east of the Project Site, is the only inert waste facility in the County operating under a full solid waste permit. The facility is permitted to accept up to 8,000 tons of inert waste, including asbestos-containing materials (ACMs), municipal solid waste, clean and contaminated (non-hazardous) soils, and tires, per day, and accepted a total of 321,830 tons of inert waste in 2020.[126] With an estimated remaining capacity of 64.64 million tons (51.71 million cubic yards) and an average of 1,032 tons of inert waste per day, the Azusa Land Reclamation Landfill has capacity to operate for another 201 years; however, the facility is only permitted to operate until 2045.[127] There are nine additional inert debris facilities in Los Angeles County that operate under the notification tier (i.e., those that do not require a full solid waste permit or other authorization tier), which can collectively accept up to 27,130 tons (21,704 cubic yards) per day. In 2020, these facilities accepted a total of 3,423,466 tons (2,738,772 cubic yards) of inert waste, with an average daily disposal rate of 10,973 tons (8,778 cubic yards).[128]

Non-hazardous, non-construction (i.e., operational) solid waste collected by LASAN is taken to the Central L.A. Recycling & Transfer Station (CLARTS) for transfer and is ultimately disposed of at privately-owned Class III landfill facilities throughout Los Angeles County, typically the Sunshine Canyon Landfill. CLARTS has a permitted capacity of 4,050 tons/day and a present

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[126] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 27.*

[127] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, page 36.*

[128] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-2, Table 5: Summary of Existing Inert Debris Disposal Sites in Los Angeles County (As of December 31, 2020).*

capacity of 2,500 tons per day,[129] for a remaining capacity of 1,525 tons per day. The Sunshine Canyon Landfill is permitted to accept 12,100 tons of solid waste per day, had an average daily disposal intake of 8,039 tons per day in 2020, and an estimated remaining capacity of 54.08 million tons.[130] There are nine additional Class III landfills available to dispose of solid waste generated within the County that collectively have a maximum daily permitted capacity of 33,197 tons per day, an average daily disposal intake of 11,252 tons per day, and an estimated remaining capacity of 88.59 million tons.[131]

Construction

Although the Project Site's vacant, undeveloped conditions mean that no demolition waste would be generated, construction activities associated with the Project would result in the generation of general construction waste, such as scrap lumber, concrete, drywall, residual wastes, packing materials, and plastics. Much of these materials would be diverted from landfills and recycled and salvaged to the maximum extent feasible with a minimum diversion rate of 65 percent pursuant to CALGreen standards. Existing City regulations and standard conditions of approval require construction to show compliance with CALGreen diversion requirements. Specifically, the City adopted the Citywide C&D Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling C&D waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste. It requires that all C&D waste generated within City limits be taken to City-certified C&D waste processors, where the waste would be recycled to the extent feasible.

The remaining 35 percent of C&D debris and construction waste that is not required to be recycled would either be voluntarily recycled at a recycling facility or disposed of in an inert landfill. As described above, Azusa Land Reclamation facility has a remaining capacity of 64.64 million tons (51.71 million cubic yards) and is permitted to operate until 2045. Nine additional inert debris facilities in Los Angeles County can collectively accept up to 27,130 tons (21,704 cubic yards) per day. Due to the temporary nature of construction and required compliance with the City's recycling mandates, the type and amount of construction anticipated for the Project would not be expected to generate waste in excess of standards. Additionally, based on the daily and total capacities and anticipated operational duration of existing facilities that accept inert waste in the county, construction that would occur under the Project would also not generate waste in excess of the capacity of local infrastructure. Through mandatory compliance with regulatory diversion rates, construction activities would not otherwise impair the attainment of solid waste reduction goals. Therefore, construction of the Project can be adequately served by solid waste infrastructure and impacts during construction would be less than significant.

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[129] *City of Los Angeles, Bureau of Sanitation, CLARTS Facts & Services, https://lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-cl/s-lsh-wwd-s-cl-fs, accessed December 26, 2023.*

[130] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

[131] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

Operation

Once operational, future redevelopment within the Project area would produce solid waste on a regular basis as a result of operation and maintenance activities. Single-family residences within the City are given separate bins for curbside sorting and collection of refuse, organic waste, and recyclables. The Project area is currently served by solid waste collection through LASAN and new routes would not be required; however, the Project would be required to provide a minimum of two months' advance notice to the Bureau of Sanitation to allow for integration into the weekly collection schedule.

LASAN collects an average of 6,652 tons of solid waste per day from more than 750,000 homes.[132] Solid waste generated by the Project would be of types and amounts typical for residential land uses. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that a minimum of 50 percent of the Project's solid waste would be diverted from landfills. Due to the types of waste that would be generated by the Project and required compliance with diversion requirements, operation of the Project would not be expected to generate waste in excess of standards.

As described above, LASAN's transfer station, CLARTS, a remaining capacity of 1,525 tons per day; and the anticipated Class III landfill that would dispose of solid waste generated by the Project, the Sunshine Canyon Landfill, is permitted to accept 12,100 tons of solid waste per day, had an average daily disposal intake of 8,039 tons per day in 2020, and an estimated remaining capacity of 54.08 million tons.[133] In addition, there are nine additional Class III landfills available to dispose of solid waste generated within the County that collectively have a maximum daily permitted capacity of 33,197 tons per day, an average daily disposal intake of 11,252 tons per day, and an estimated remaining capacity of 88.59 million tons.[134] Accordingly, operation of the Project would not generate solid waste that would exceed the capacity of local infrastructure.

Compliance with applicable regulatory standards and requirements with regard to solid waste would be mandatory for the Project. As stated above, the Project's trash hauler (LASAN) would be subject to the requirements of AB 939 to divert a minimum of 50 percent of solid waste from landfills. Through mandatory compliance with regulatory diversion rates and on-site source-separation of solid waste, operation of the Project would not otherwise impair the attainment of solid waste reduction goals.

Mitigation Measures

None required.

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[132] *City of Los Angeles, Bureau of Sanitation, Solid Resources, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s, accessed December 26, 2023.*

[133] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

[134] *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2020 Annual Report, October 2021, Appendix E-4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.*

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. The Project, like all other development in Los Angeles, would be required to adhere to City ordinances with respect to waste reduction and recycling in order to meet statewide solid waste reduction mandates. Pursuant to LASAN's OrganicsLA, which is a curbside organics recycling program mandated by SB 1383, the Project would be required to separate organic waste to be collected by LASAN. The Project would also be provided with separate bins for curbside sorting and collection of refuse, organic waste, and recyclables in support of the City's compliance with AB 939. Compliance with City ordinances and policies is mandatory. As a result, the Project would conflict with the City's ability to meet with federal, state, and local management and reduction statutes and regulations related to solid waste. No impacts would occur and no mitigation would be required.

Mitigation Measures

None required.

XX. WILDFIRE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. As previously discussed, the Emergency Management Department (EMD) leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Master Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response plans. The Brush Fire Hazard Specific Annex[135] was developed in cooperation and with input from the City departments with primary response/support activities, as well as input from appropriate non-City agencies with identified activities related to brush fire emergencies, and is reviewed every other year. This Annex details the City's responsibilities for response to brush fires. It identifies roles and responsibilities for appropriate departments, procedures for rapid notification to City departments and the public in the event of brush fire related emergencies, and ensures consistency with federal, state, county, and other local governments' emergency response plans and operations.

The Project Site is located within a Very High Fire Hazard Severity Zone (VHFHSZ).[136] Implementation of development projects within a VHFHSZ have the potential to impair an emergency response plan or emergency evacuation plan through physical alterations to designated disaster routes or facilities or through the addition of substantial numbers of people within the VHFHSZ that would require emergency response/assistance during a wildfire or of vehicles/traffic along disaster routes.

As detailed in response to **Checklist Question IX(f)**, the Project's mandatory adherence to the requirements of the Northeast Los Angeles Hillsides Zone Change Ordinance (Ordinance No. 180,403) pertaining to construction staging would ensure that adequate emergency access to the Project Site and surroundings would be maintained at all times during construction and the Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way, or include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site during operation. As discussed in **Checklist Section XV, Public Services**, LAFD reviewed the Project's plans, including the proposed roadway widening, dedication, and hammerhead turn-around and issued an approval on July 31, 2024.[137]

As also detailed in response to **Checklist Question IX(f)**, the addition of vehicles associated with a single-family residence and attached ADU would represent a negligible increase that would not be expected to result in substantial delays or capacity exceedances on the designated disaster routes that would be utilized for evacuation of the Project area during an emergency.

Based on the above, the Project would not physically alter a designated disaster route or facility and would not add a substantial amount of vehicles/traffic along disaster routes in a manner that would impair or interfere with emergency response or evacuation. Additionally, the Project is expected to generate a maximum of seven residents, which would not be considered a substantial number of additional people that would require emergency response or assistance during an

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[135] *City of Los Angeles, Emergency Management Department, Emergency Operations Plan, Brush Fire Hazard Specific Annex, March 2018.*

[136] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

[137] *City of Los Angeles Fire Department, Fire Development Services, Hydrants & Access, Approved Plans, Transaction ID Number: H23-98446, Stamped by Kurt Corral #445, July 31, 2024.*

emergency. As detailed in response to **Checklist Question XV(a)**, the Project can be adequately served by fire protection. As such, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and no mitigation would be required.

Mitigation Measures

None required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less than Significant Impact. The Project Site is not located within a High Wind Velocity Area; however, it is located within a VHFHSZ and a Hillside Area.[138] The Project Site's inclusion within a VHFHSZ indicates an elevated fire hazard potential at the Site based on the conditions that create a likelihood and expected fire behavior over a 30- to 50-year period.[139] Accordingly, as discussed in response to **Checklist Question IX(g),** areas designated within a VHFHSZ are required to be designed and constructed in accordance with the design requirements of the Los Angeles Fire Code, including, but not limited to, the following:

- Ignition-resistant roofing and other building materials
- Fire-Retardant-Treated Wood or noncombustible materials
- Roof coverings, valleys, and gutters
- Attic ventilation
- Eave or cornice vents
- Sprinkler systems
- Landscaping with fire-retardant plants
- Vegetation clearance

As further discussed, prior to issuance of an Occupancy Permit, the Project Applicant would be required to coordinate with the LAFD to ensure that the Project incorporates all appropriate fire-prevention measures. All ingress/egress and dedications/improvements to the public right-of-way associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process.

The Site's location within a Hillside Area indicates a potential for higher risks associated with wildfires as wildfires burn up a slope faster and more intensely with longer flame lengths than along flat ground. As presented in **Appendix F.3**, the slope of N. Thomas Street varies between 1.1 percent and 54.2 percent along five selected segments of Thomas Street between approximately Alta Street to just north of the Project Site. Additionally, the Project would widen N. Thomas Street to 20 feet adjacent to the Project Site and the Project would also create a

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[138] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.*

[139] *California Department of Forestry & Fire Protection, Office of the State Fire Marshall, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed August 19, 2024.*

hammerhead turn-around at the top of N. Thomas Street at its intersection with N. Prewett Street sized to accommodate emergency vehicle maneuvering. Additionally, owners of the proposed residence would be required to comply with the brush clearance requirements of LAMC Section 57.4906.5.1, including the additional brush clearance requirements for properties within the VHFHSZ, and to maintain defensible space per regulation found in the California Government Code Section 51175—51189 for the VHFHSZ within Local Responsibility Areas. As such, the Project would not exacerbate wildfire risks. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The Project would involve the construction of new structures in an improved area of the City. The Project would not require and does not propose the installation or maintenance of roads or emergency water sources; however, because the Project Site is located within a VHFHSZ, appropriate fuel breaks (defensible space) would be required and because the Site is currently undeveloped, connection to offsite electrical and other utilities lines would be required. However, pursuant to LAMC Section 57.4906.5.1.1.10, all individuals performing grass or brush clearance activities in the VHFHSZ shall adhere to the following specific requirements:

1. Grass or brush clearance operations shall not be conducted on red flag days.
2. Individuals engaged in grass or brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush.
3. Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire.
4. All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department.
5. A Class 2-A two (2) gallon water fire extinguisher, pressurized garden hose with attached nozzle (fully open), or comparable pressurized Class 2-A extinguishing device, shall be within 10 feet of any grass or brush clearance operation.
6. Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 B:C dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation.
7. A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation.
8. A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material.

The Project Site contains only annual weeds and no protected biological resources exist that clearance would remove. Accordingly, the maintenance of fuel breaks would not result in impacts to the environment. With regard to installation of utilities, as detailed in **Checklist Section XIX, Utilities and Service Systems**, installation of new onsite utility infrastructure and connections to existing offsite utility infrastructure would be conducted in accordance with applicable state and local building codes and in coordination with and installed by or under the supervision of applicable service providers and associated impacts are temporary, localized, and would not be significant.

Furthermore, as demonstrated throughout this IS/MND, implementation of the Project would not result in significant temporary or ongoing impacts to the environment. Accordingly, implementation of the Project's infrastructure would not exacerbate fire risk or result in ongoing impacts to the environment. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

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?

Less than Significant Impact. As detailed throughout this IS/MND, the Project would be required to comply with all hillside development standards and regulations, including those pertaining to drainage and slope stability. With mandatory adherence to the codes and regulations discussed within this section and throughout the Project's environmental analysis, the Project would not expose people or structures to significant risks as a result of runoff, slope instability, or drainage changes. Therefore, impacts would be less than significant and no mitigation measures would be required.

Mitigation Measures

None required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation Incorporated. *State CEQA Guidelines* Section 15065(a) requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in *State CEQA Guidelines* Section 15382 as "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

As indicated by the analysis in **Checklist Section IV, Biological Resources**, the Project Site contains only annual weeds[140] and would, accordingly, not significantly impact biological

[140] *Letter from Arsen Margossian, M.S., Certified Consulting Arborist (#WE-7233A), Re: City of Los Angeles Protected Trees and Shrubs, 2824 & 2830 Prewett St., Los Angeles, CA 90031, March 29, 2021.*

resources, including candidate, sensitive, or special status species; riparian habitat or other sensitive natural community; state or federally protected wetlands; native resident or migratory wildlife corridors or nursery sites; or protected trees. As such, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in **Checklist Sections V, Cultural Resources**, and **VII, Geology and Soils**, the Project would have less than significant impacts on cultural resources, including historical and archaeological resources and human remains; and paleontological resources. Additionally, as detailed in **XVIII, Tribal Cultural Resources**, implementation of mitigation would ensure that significant impacts to potential tribal cultural resources do not occur. As such, the Project would not eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant and no further mitigation would be required.

Mitigation Measures

See mitigation measure **MM TCR-1** in **Section XVIII, Tribal Cultural Resources**.

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 with Mitigation Incorporated. Cumulative impacts refer to two or more individual effects which, when evaluated together, are considerable or would compound or increase other environmental effects. A list of development projects proposed within one-quarter mile of the Project Site within the past 10 years is presented below in **Table XXI-1, Related Projects within One-Quarter Mile**. These developments, together with the Project, represent the cumulative development in the Project area.

Table XXI-1
Related Projects within One-Quarter Mile

Address	Case Number	Date Filed	Scope of Work
2821 N. Sierra Street	AA-2024-5787-PMEX ZA-2024-5791-ADJ	09/09/2024	Parcel Map Exemption (Lot Line Adjustment); Area Height and Building Line Adjustments (Rear and Side Yard Setback Adjustments)
2820 N. Sierra Street	ZA-2024-5794-ADJ	09/09/2024	Area Height and Building Line Adjustments (Rear and Side Yard Setback Adjustments)
3144 N. Johnston Street; 3150 N. Johnston Street	ZA-2023-6935-ZAD-HCA ZA-2023-6936-ZAD-HCA	10/17/2023	New SFRs
3124 N. Johnston Street	ZA-2021-10634-ZAD-ZAA-HCA	12/22/2021	New SFR

Table XXI-1
Related Projects within One-Quarter Mile

Address	Case Number	Date Filed	Scope of Work
3114 N. George Street	ENV-2021-1365-CE	02/19/2021	SFR Addition
2918 N. Thomas Street	ENV-2014-3212-MND-REC2	11/10/2020	New MFR (6 du)
506 E. Clifton Street	ZA-2019-6867-ZAD	11/15/2019	New SFR
2618 N. Thomas Street	ZA-2019-4619-ZAD-ZAA	08/05/2019	New SFR
500 E. Clifton Street	ZA-2019-4258-ZAD	07/18/2019	New SFR
2751 N. Abrigo Avenue	ZA-2019-1962-ZAD ENV-2019-1963-EAF	04/02/2019	New SFR
3230 E. Altura Walk	ZA-2019-1932-ZAD	04/02/2019	SFR Addition
3203 N. Johnston Street	ZA-2019-593-ZAD	01/29/2019	New SFR
3232 N. Johnston Street	ZA-2018-7060-ZAD	12/3/2018	New SFR
3308 N. Johnston Street	ZA-2018-7030-ZAA-ZAD ENV-2018-7032-EAF	11/30/2018	New SFR
3117 N. Minnesota Street	ADM-2018-1089-ADU	02/28/2018	New ADU
3014 N. Minnesota Street	ADM-2018-137-QC	01/10/2018	SFR Addition
2943 N. Alta Street	ZA-2017-409-ZV-ZAD	02/01/2017	New SFR
2831 N. Thomas Street	ZA-2016-1809-ZAD	05/25/2016	New SFR
3314 E. Two Tree Avenue	ZA-2015-4321-ZAD	11/24/2015	New SFR

SFR = single-family residence; MFR = multi-family residence; du = dwelling unit
Source: City of Los Angeles, Department of City Planning, Bi-Weekly Case Reports by Community Plan Area, available at https://planning.lacity.gov/resources/bi-weekly-case-report, accessed January 1, 2025, and the Zone Information and Map Access System (ZIMAS). The above related projects represent cases filed for development with the City between 2015 and 2024.

As shown in **Table XIX-1**, the City has received applications for 13 additional single-family residences; one new, six-unit, multi-family residence; one new ADU; three additions to existing single-family residences; and two adjacent projects requesting lot line and setback adjustments for parcels with existing residential development within one-quarter mile of the Project Site. While all of these related projects may occur within the vicinity of the Project, as with the Project, each related project would be subject to an appropriate level of environmental review on a case-by-case basis. As with the Project, all related projects would be reviewed for consistency with underlying zoning and land use designations and subject to regulatory control measures and standard conditions of approval that would reduce any potential impacts to less-than-significant levels. Additionally, while the status of the specific related projects identified, the related projects have been proposed at different times over a 10-year period, which is likely to avoid impacts associated with concurrent construction; there are currently no other issued or pending haul route permits for the roadways surrounding the Project Site.[141] Operationally, the types of residential development proposed by the related projects do not represent the types of land uses associated with significant impacts on the environment. Furthermore, as discussed throughout this IS/MND, no significant impacts after mitigation are identified for the Project.

The Project would include roadway improvements in the form of paving and widening the currently unpaved N. Thomas Street adjacent to the Site and would create a hammerhead turn-around at the top of N. Thomas Street sized to accommodate emergency vehicle maneuvering. Future development of vacant parcels in the vicinity to the east along N. Thomas Street has not been

[141] *City of Los Angeles, Bureau of Engineering, Department of Public Works, NavigateLA, available at: https://navigatela.lacity.org/navigatela/, accessed January 10, 2024.*

proposed and in the event that future development projects are proposed for these parcels, they would be evaluated on a case-by-case basis for development-specific environmental impacts. Based on the location of these parcels in close relation to the Project Site, future proposed projects in the vicinity could cause a substantial adverse change in the significance of a tribal cultural resource, and therefore may have a significant effect on the environment. However, each project will be subject to CEQA analysis and mitigation, if required. These future projects would also be required to demonstrate consistency with underlying land use plans and zoning, as well as with applicable regulations, requirements, and policies with regard to residential development. In the event that potentially significant impacts are identified for such future development, they would be required to address such impacts through project design features or mitigation to the satisfaction of the City.

Based on the above, cumulative impacts would be less than significant and the Project's contribution would not be cumulatively considerable. No mitigation would be required.

Mitigation Measures

None required.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation. As required by *State CEQA Guidelines* Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, utilities and service systems, and wildfire. These changes are addressed in **Checklist Sections III, Air Quality; VII, Geology and Soils; VIII, Greenhouse Gas Emissions; IX, Hazards and Hazardous Materials; X, Hydrology and Water Quality; XIII, Noise; XIV, Population and Housing; XV, Public Services; XVII, Transportation; XIV, Utilities and Service Systems;** and **XX, Wildfire** of this IS/MND.

As detailed in these sections, all potential impacts of the Project have been identified and have been determined to be less than significant. Through compliance with existing regulations and conditions of approval, the Project would not have the potential to result in substantial adverse impacts on human beings, either directly or indirectly. Therefore, impacts would be less than significant with mitigation and no further mitigation measures would be required.

Mitigation Measures

None required.

5 MITIGATION AND MONITORING PROGRAM

5.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project's impacts in the MND takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

5.2 ORGANIZATION

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two 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.

5.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not in and of itself require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5.5 MITIGATION MONITORING PROGRAM

A. Tribal Cultural Resources

Project Design Features

No specific project design features with regards to Tribal Cultural Resources are identified in the MND.

Mitigation Measure

MM-TCR-1 Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work directly adjacent or related to the Project), the Applicant, or its successor, shall retain a qualified tribal monitor(s) from and approved by the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe). Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. The Applicant, or its successor, and the tribal monitor(s) shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity, or the issuance of any permit necessary to commence a Ground Disturbing Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the tribal monitor(s) shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the tribal monitor(s). The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site, a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant and/or the City upon request to the Tribe(s). If any Project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribe(s) by the Applicant, in writing, upon completion of

each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe(s) by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe(s) provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the tribal monitor(s), until the potential "tribal cultural resources" are properly assessed and addressed by the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the tribal monitor(s)) until the find can be assessed by the tribal monitor(s).

2. If the tribal monitor(s) determine the resources are Native American in origin, the Tribe(s) will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe's reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

3. The Applicant, or its successor, shall implement the Tribe's recommendations if the tribal monitor(s), conclude that the Tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the Tribe(s), the tribal monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state, or local law, rule, or regulation.

5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by the tribal monitor(s) and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.

6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the City of Los Angeles Department of City Planning, Central Project Planning Division, the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

8. Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(d)(2), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

MM-TCR-1: Monitor Retention

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Pre-Construction and Construction
- **Monitoring Frequency**: Once at plan check prior to issuance of grading permit; ongoing during construction.
- **Action Indicating Compliance**: Inclusion in grading and building permit specifications; inspection of exposed cultural materials by a qualified monitor; and stop of work during inspection; a copy of the survey, study or report is submitted to the City of Los Angeles Department of City Planning, Central Project Planning Division, the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File if applicable.