4.0 INITIAL STUDY AND ENVIRONMENTAL ANALYSIS

CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST

<table>
<tr><td colspan="2">LEAD CITY AGENCY:
City of Los Angeles, Department of City Planning</td><td>COUNCIL DISTRICT:
CD 5 – Koretz</td><td>DATE:
November 2020</td></tr>
<tr><td colspan="4">RESPONSIBLE AGENCIES:</td></tr>
<tr><td colspan="2">PROJECT TITLE:
Belmont Village Senior Living Westwood II</td><td>ENVIRONMENTAL CASE:
ENV-2019-5735-SCEA</td><td>CASE NOS:
ZA-2018-3422-ELD-CU-DRB-SPP-WDI-SPR; VTT-82107</td></tr>
<tr><td colspan="2">PREVIOUS ACTIONS CASE NO.
No recent activity</td><td colspan="2">☒ DOES have significant changes from previous actions.
☐ DOES NOT have significant changes from previous actions</td></tr>
<tr><td colspan="4">PROJECT LOCATION: 10822 W. Wilshire Boulevard and 10812 W. Ashton Avenue, Los Angeles, California, 90024</td></tr>
<tr><td colspan="4">PROJECT DESCRIPTION: The proposed Project would construct a new 12-story, 176,580-square foot Eldercare Facility containing up to 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, 46 Alzheimer's/Dementia Care Housing guest rooms, and associated residential amenity and service areas within a single building located on the northern portion of the Project Site located at 10822 Wilshire Boulevard that is currently owned by the Westwood Presbyterian Church (Church). The Project would also construct a new two-story, 19,703-square foot Childcare Facility containing 10,238 square feet of classroom, administrative office space, and multipurpose/group space and 1,845 square feet of church-related administrative offices within a single building located on the southern portion of the Project Site at 10812 Ashton Avenue. A minimum of 184 parking spaces for the Project would be provided on the ground floor level adjacent to the Childcare Facility and within a three-level subterranean parking garage located below the Eldercare Facility.</td></tr>
<tr><td colspan="2">COMMUNITY PLAN AREA:
Westwood
STATUS:
☐ Preliminary ☒ Does Conform to Plan
☐ Proposed ☐ Does NOT Conform to Plan
☒ Adopted in 1999</td><td>AREA PLANNING COMMISSION:
West Los Angeles</td><td>CERTIFIED NEIGHBORHOOD COUNCIL:
North Westwood</td></tr>
<tr><td>EXISTING ZONING:
[Q]R5-3-O and R1-1</td><td>MAX DENSITY ZONING:
200 sf/du and 5,000 sf/du</td><td colspan="2">LA River Adjacent:
No</td></tr>
<tr><td>GENERAL PLAN LAND USE:
High Residential and Low Residential</td><td>MAX. DENSITY PLAN:
Wilshire/Westwood Specific Plan – 100 du/acre</td><td colspan="2">PROPOSED PROJECT DENSITY:
57 du/acre</td></tr>
</table>

Determination (to be completed by 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.

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

Robert Keatinge	Planning Assistant	11/12/2020
Signature		

4.1 AESTHETICS

Except as provided in Public Resources Code (PRC) Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☒	☐
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other

aesthetic impact as defined in the *L.A. CEQA Threshold Guide (2006)* shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[1]

As shown in Sections 2.0, Project Description and 3.0. SCEA Criteria, the Project is a mixed-use development containing residential and institutional uses on an infill site within a TPA and therefore, SB 743 applies to the Project and the Project's potential aesthetic effects shall not be considered significant environmental impacts. The analysis presented in this aesthetics section is for informational purposes only.

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

Less Than Significant Impact. The Conservation Element of the City of Los Angeles General Plan (General Plan) describes scenic vistas as the panoramic public view access to natural features, including views of the ocean, striking natural terrain, or unique urban or historic features.

The Project Site is located in an urbanized area of the City along Wilshire Boulevard, a major roadway. As described in the Project Description, the Project Site is currently developed with the Church Sanctuary building, Fellowship Hall, administrative offices and preschool, an approximately 2,400 square foot single-family residence, and surface parking areas. Excluding the Sanctuary, all other uses will be demolished to provide for the Project. While the Project would develop the Project Site with a 12-story Eldercare Facility with a maximum height of 153 feet, and two-story childcare facility with a maximum height of 33 feet, 3 inches feet, due to the developed nature of the area, no public views of natural features or terrain are visible from the Project Site.

Panoramic views that include the Project Site are available from a variety of vantage points in the Santa Monica Mountains to the north. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized area along Wilshire Boulevard. Despite the increase in building height and density that would result from the Project, the Project Site would remain difficult to discern within the greater fabric of urban development. In terms of long-range views, the Project would not interfere with current views of the Pacific Ocean, the downtown skyline and/or distance horizon lines that are available from public-rights-of-way within the Santa Monica Mountains.

The 2016-2040 RTP/SCS Program EIR (PEIR) Mitigation Monitoring and Reporting Program (MMRP) contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to aesthetics. These include Mitigation Measure AES-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. This measure is not applicable to the Project as no potential significant aesthetics impacts have been identified. The Project would have a less than significant impact on a scenic vista, and pursuant to SB 743 and the City's ZI File No. 2452, the Project would not result in any aesthetics-related impacts.

[1] *City of Los Angeles Department of City Planning, Zoning Information (ZI) File No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed October 24, 2019.*

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

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially designated state scenic highway is the Topanga Canyon State Scenic Highway, approximately 22 miles northwest of the Project Site.[2] Therefore, the Project would not substantially damage scenic resources, including those located within a state or City-designated scenic highway.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, no mitigation measures are applicable.

The Project would result in a less than significant impact to scenic resources within a state scenic highway, and pursuant to SB 743 and the City's ZI File No. 2452, the Project would not result in any aesthetics-related impacts.

c) For a project in a non-urbanized area, would it 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.) For a project in an urbanized area, would it conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, the northern portion of the Project Site is zoned [Q]R5-3-O (Multiple Dwelling with Q Condition, Height District 3, Oil Drilling District). The northern portion of the Project Site is also located within the boundaries of the Wilshire-Westwood Scenic Corridor Specific Plan, which establishes development standards that supersede the LAMC. The R5 zone permits high-density multi-family residential units as well as church and preschool uses. The existing Q condition, imposed by Ordinance No. 163,194, requires design review approval by the Westwood Community Design Review Board for all new projects with two or more units. Height District No. 3, in conjunction with the R5 zone, establishes a maximum FAR of 10:1 and no height limit. However, the Specific Plan imposes a maximum FAR of 8:1 and a height limit of six stories/75 feet. A 25-foot building line exists along Wilshire Boulevard.[3]

The Specific Plan's allowance of an FAR of up to 8:1 has historically facilitated the construction of numerous residential high-rise buildings of 20 stories or higher along Wilshire Boulevard; however, absent discretionary approval of a height increase, the Specific Plan restricts building height to 6 stories and 75 feet. Measured from lowest grade to the top of its uppermost penthouse structure, the 12-story Eldercare Facility is 153 feet in height. In connection with the Project's requested Eldercare Facility Unified Permit, the Applicant is requesting approval of the proposed height. As proposed, the 12-story Eldercare Facility would be consistent with the existing high-

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[2] *Caltrans Website, List of Eligible and Officially Designated State Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed December 13, 2019.*

[3] *City of Los Angeles, Ordinance No. 83,605*

rise residential buildings that characterize Wilshire Boulevard within the Specific Plan. The 176,580 square foot Eldercare Facility would achieve an FAR of 5.45:1.

Westwood Community Plan

As set forth in the Urban Design Chapter of the Westwood Community Plan, the purpose of the chapter is to establish design policies and standards for in commercial and multi-residential development. The Urban Design Chapter notes that policies and standards included in this section of the Community Plan can be achieved through implementation of a Specific Plan, which the northern portion of the Project Site is located in (and the Project's consistency with the urban design policies of the Wilshire-Westwood Scenic Corridor Specific Plan is discussed below). For the Childcare Facility, which is located outside of the Specific Plan, the Project would adhere to the Community Plan's Urban Design policies by incorporating on-site landscaping through new on-site and street trees and plantings, installing on-site lighting and sidewalks to improve pedestrian accessibility, and directing all light away from adjacent residences. The Project would retain existing valued neighborhood services (church and childcare services) on a site that is located in the transition area between the R-1 zoned properties to the south/southeast and the dense, high-rise corridor to the north along Wilshire Boulevard., while the new Eldercare Facility exceeds a 75-foot building width, it does not cast a shadow upon a residential structure located more than 200 feet distant of the Project Site's north or south property line for more than 2 hours between the hours of 9am and 3pm. In addition, as described in the Project's shade-shadow study, if the Eldercare Facility's design was modified to reduce its width to no more than 75 feet, the building would increase in height, resulting in a greater potential for shade and shadow impacts under the Specific Plan's thresholds. Therefore, pursuant to the Eldercare Facility Unified Permit, a determination to allow the proposed building width has been requested.

In addition, the Eldercare Facility has been designed to articulate the building's façade with a variety of planes, colors, and textures, which would further break up the massing of the building's envelope. Therefore, the proposed Eldercare Facility would be generally consistent with the design standards of the Wilshire-Westwood Scenic Corridor Specific Plan, and would also be compatible with adjacent development and the surrounding neighborhood, thereby reducing potential impacts regarding scenic quality.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to aesthetics. These include Mitigation Measure AES-3(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. This measure is not applicable to the Project as no potential significant aesthetics impacts pertaining to visual character have been identified. The Project would have a less than significant impact regarding visual character, and pursuant to SB 743 and the City's ZI File No. 2452, the Project would not result in any aesthetics-related impacts.

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

Less Than Significant Impact. As described above, the Project Site is currently developed with a variety of uses, including the Church Sanctuary, administrative offices, preschool, single-family residence, and surface parking lot, which that generate only moderate levels of artificial light and glare.

Light sources within the Project Site include low-level security lighting and vehicle headlights when operating. Existing glare sources within the Project Site include glass and metal vehicle and building surfaces. The surrounding ambient nighttime lighting environment is typical of an urban environment. The primary nighttime lighting sources in the Project Site vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting.

The proposed Project would introduce new sources of light and glare that are typically associated with residential and institutional uses, including architectural lighting, security lighting, and exterior lighting for outdoor common spaces, such as the outdoor garden and courtyard areas. Impacts related to light and glare during both construction and operation are discussed below.

Construction Impacts

In accordance with the provisions of LAMC Section 41.40, construction activities would occur between 7:00 AM and 9:00 PM on weekdays and between 8:00 AM and 6:00 PM on Saturdays and national holidays, with no construction permitted on Sundays. During construction of the Project, exterior lights would be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Construction lighting would be used for safety and security purposes only, and would be shielded and directed downwards to prevent light spillover and ensure that no direct beam illumination is provided outside of the Project Site boundary. Minor amounts of glare could occur due to on-site vehicles and construction equipment moving across the Project Site. However, these sources would be intermittent and limited. All construction light and glare emitted by the Project construction activities would be temporary. No temporary structures with capability of producing shade/shadows would be placed on-site.

Operational Impacts

Development of the Project would introduce a new 12-story building located on the northern portion of the Project Site and a two-story building located along the southern portion. The new buildings would increase the number of windows and interior lighting; however, this would not be a substantial source that would affect daytime lighting levels.

The Project Site is in a fully urbanized area of the City located along a major roadway, Wilshire Boulevard, and approximately 3,500 feet from a major freeway (I-405), which generate high levels of nighttime lighting. The overwhelming majority of the Project's parking would be located in a three-level subterranean parking garage and would be entirely enclosed. Uses directly bordering the Project Site to the north and east are medium- to high-density residential uses that would generate comparable or higher levels of existing nighttime lighting as the Project. The Childcare Facility would be located adjacent to single-family residences on the eastern and southern boundaries of the Project Site, but would not generate substantial nighttime lighting because use of the building would primarily occur during the daytime. In addition, the Project would be required to adhere to existing regulatory requirements, such as those contained in the LAMC and City Green Building Code as well as the State Green Building Standards Code (CALGreen) (e.g., LAMC Section 93.0117(b), LAMC Section 99.05.106.8, CALGreen Section 5.106.8), which include regulations intended to reduce light and glare.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to aesthetics. These include Mitigation Measure AES-4(b), listed in detail in

Section 3.3 of this SCEA, which identifies measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. This measure is not applicable to the Project because, as discussed above, no potential significant aesthetics impacts pertaining to light or glare have been identified, and regulatory compliance would further ensure that no new light or glare impacts would occur. The Project would have a less than significant impact regarding light and glare, and pursuant to SB 743 and the City's ZI File No. 2452, the Project would not result in any aesthetics-related impacts.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA). The Project is an infill development project in an urbanized area of the City, and development of the Project along with related projects would result in an incremental intensification of land uses in the Project vicinity. However, the Project and related projects would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design. Furthermore, as described above, the Project will result in less than significant impacts regarding scenic vistas, visual character, and light and glare, and pursuant to SB 743 and the City's ZI File No. 2452, the Project as well as other infill projects located within a TPA would not result in any aesthetics-related impacts. Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable.

4.2 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.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 nonagricultural 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 PRC section 12220(g)), timberland (as defined by PRC 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 nonforest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use?	☐	☐	☐	☒

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. The Project Site is located in an urbanized area of the City. As previously discussed, the Project Site is currently developed with the Church Sanctuary, administrative offices, a preschool, and a single-family residence, as well as a surface parking lot. The uses surrounding the Project Site include commercial and residential uses. The Project Site and surrounding area are not mapped as Prime, Unique, or Farmland of Statewide Importance pursuant to the Farmland

Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[4]

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to agriculture and forest resources. These include Mitigation Measure AF-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. The Project would not convert farmland to a non-agricultural use, and therefore, the measures included in Mitigation Measure AF-1(b) are not applicable to the Project. No impact would occur.

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

No Impact. The northern portion of the Project Site is zoned as [Q]R5-3-O (Multiple Dwelling with Q Condition, Height District 3, Oil Drilling District). The R5 zone permits high-density multi-family residential units as well as church and preschool uses. The southern portion of the Project Site is zoned as R1-1 (One Family, Height District 1). The R1 zone permits single-family residential uses and accessory structures; pursuant to LAMC Section 12.24 W.51, childcare facilities are permitted in the R1 zone and pursuant to LAMC Section 12.24 W.9, church uses are also permitted in the R1 zone. The Project is not zoned for agricultural use and/or subject to a Williamson Act Contract.[5]

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to agriculture and forest resources. These include Mitigation Measure AF-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. As discussed in the impact analysis above, the Project Site does not contain existing agricultural uses or land under a Williamson Contract; therefore, the measures included in Mitigation Measure AF-2(b) are not applicable to the Project. No impact would occur.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is developed with the Church Sanctuary, administrative offices, a preschool, and a single-family residence, as well as a surface parking lot. The Project Site does not include any forest land or timberland and is zoned as [Q]R5-3-O and as R1-1 (One-Family Zone, Height District 1). The Project Site is not zoned for forest land and is not used as forest land.

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[4] *California Department of Conservation, Maps. Agriculture, https://maps.conservation.ca.gov/agriculture/, accessed December 16, 2019.*

[5] *California Department of Conservation, Williamson Act Program, https://www.conservation.ca.gov/dlrp/lca, accessed December 16, 2019.*

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, no mitigation measures are applicable. The Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code and no impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no mitigation measures are applicable. The Project would not result in the loss or conversion of forest land to non-forest use and no impact would occur.

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

No Impact. The Project Site is located in an urbanized area of the City and does not include farmland or forest land. Although a portion of the parcel located west of the Project Site is zoned for agricultural use, this is inconsistent with the current site use, as the property has been used as a cemetery and memorial park for decades. None of the surrounding area is mapped as forest land. As stated above, the Project Site is not mapped as farmland or forest land, is not zoned for farmland or forest land, and does not contain any agricultural or forest uses.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to agriculture and forest resources. These include Mitigation Measure AF-1(b) and GHG-3(b), listed in detail in Section 3.3 of this SCEA, were developed to reduce potential impacts related to agricultural conversion. As discussed in the impact analysis above, the Project Site does not contain farm or forest land, therefore the measures included in Mitigation Measure AF-1(b) are not applicable to the Project. The Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use and no impact would occur.

Cumulative Impacts

No Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA). Notwithstanding, as with the Project, the related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing farming, agricultural or forest-related operations. Therefore, development of the related projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use, or result in the loss of forest land or the conversion of forest land to non-forest use, and no cumulative impacts would occur.

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4.3 AIR QUALITY

Would the project:	Potentially significant impact	Less than significant with mitigation incorporated	Less than significant impact	No impact
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 nonattainment 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?	☐	☐	☒	☐

The following analysis is based, in part, on the Air Quality and Greenhouse Gas Report (AQ/GHG Report), dated June 2020 and included in Appendix D of this SCEA. This standalone report contains environmental and regulatory framework settings, applicable significance thresholds, methodology, and impact analysis for both air quality and greenhouse gas impacts, per Appendix G of the State CEQA Guidelines. The information presented in the AQ/GHG Report has been included in this SCEA analysis.

Local Climate and Meteorology

The Project Site is in the South Coast Air Basin (SCAB), which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the SCAB is primarily influenced by meteorology and a wide range of emission sources, such as dense population centers, substantial vehicular traffic, and industry.

Air pollutant emissions in the SCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Air Quality Regulations

The federal and state governments have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent within the California Environmental Protection Agency (CalEPA). County-level Air Quality Management Districts (AQMDs) provide local management of air quality. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the local AQMDs are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide, including the SCAB.

The U.S. EPA has set primary national ambient air quality standards (NAAQS) for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), and lead (Pb). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards (known as the California ambient air quality standards [CAAQS]) for these and other pollutants, some of which are more stringent than the federal standards. Table 4-1 lists the current federal and state standards for regulated pollutants.

Table 4-1
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	NAAQS	CAAQS
Ozone	1-Hour	–	0.09 ppm
	8-Hour	0.070 ppm	0.070 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	Annual	0.030 ppm	–
	24-Hour	0.14 ppm	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
PM_{10}	Annual	–	20 µg/m^3
	24-Hour	150 µg/m^3	50 µg/m^3
$PM_{2.5}$	Annual	12 µg/m^3	12 µg/m^3
	24-Hour	35 µg/m^3	–
Lead	30-Day Average	–	1.5 µg/m^3
	3-Month Average	0.15 µg/m^3	–

ppm = parts per million
µg/m^3 = micrograms per cubic meter
Source: CARB 2016

The South Coast Air Quality Management District (SCAQMD) is the designated air quality control agency in the SCAB, which is a non-attainment area for the federal standards for ozone and $PM_{2.5}$ and the state standards for ozone, PM_{10}, and $PM_{2.5}$. The Los Angeles County portion of the SCAB is also designated non-attainment for lead (SCAQMD 2016). The SCAB is designated unclassifiable or in attainment for all other federal and state standards.

SCAQMD is responsible for limiting the amount of emissions that can be generated throughout the SCAB by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board that limit the emissions that can be generated by various uses/activities and identifying specific pollution-reduction measures that must be implemented in association with various uses and activities. These rules regulate not only the emissions of the federal and State criteria pollutants, but also toxic air contaminants (TACs) and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD. Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Specifically, Rule 403 requires control measures to minimize PM10 emissions during grading and construction activities, while Rule 1113 limits the allowable VOC content of architectural coatings.

Criteria Pollutants

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include CO, NO_2, PM_{10}, $PM_{2.5}$, SO_2, and Pb. Ozone is considered a secondary criteria pollutant because it is created by atmospheric chemical and photochemical reactions between volatile organic compounds (VOC) and nitrogen oxides (NO_X). The following subsections describe the characteristics, sources, and health and atmospheric effects of critical air contaminants.

- *Ozone.* Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_X and VOC.[6] Nitrogen oxides are formed during the combustion of fuels, while VOC are formed during combustion and evaporation of organic solvents. Because O_3 requires sunlight to form, it usually occurs in substantial concentrations between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.
- *Carbon Monoxide.* Carbon monoxide is a local pollutant that is found in high concentrations only near fuel combustion equipment and other sources of CO. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulty in people with chronic diseases, reduced lung capacity, and impaired mental abilities.

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[6] *Organic compound precursors of ozone are routinely described by a number of variations of three terms: hydrocarbons (HC), organic gases (OG), and organic compounds (OC). These terms are often modified by adjectives such as total, reactive, or volatile, and result in a rather confusing array of acronyms: HC, THC (total hydrocarbons), RHC (reactive hydrocarbons), TOG (total organic gases), ROG (reactive organic gases), TOC (total organic compounds), ROC (reactive organic compounds), and VOC (volatile organic compounds). While most of these differ in some significant way from a chemical perspective, two groups are important from an air quality perspective: non-photochemically reactive in the lower atmosphere, or photochemically reactive in the lower atmosphere (HC, RHC, ROG, ROC, and VOC). SCAQMD uses the term VOC to denote organic precursors.*

- *Nitrogen Dioxide.* Nitrogen dioxide is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. It can also contribute to the formation of ozone/smog and acid rain.
- *Suspended Particulates.* Atmospheric particulate matter is comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mists. The particulates that are of particular concern are PM_{10} (small particulate matter which measures no more than 10 microns in diameter) and $PM_{2.5}$ (fine particulate matter which measures no more than 2.5 microns in diameter). The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be different. Major man-made sources of PM_{10} are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources include windblown dust, wildfire smoke, and sea spray salt. The finer $PM_{2.5}$ particulates are generally associated with combustion processes as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.
- *Lead.* Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. The major sources of Pb emissions historically have been mobile and industrial sources. In the early 1970s, the U.S. EPA set national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The U.S. EPA completed the ban prohibiting the use of leaded gasoline in highway vehicles in December 1995. As a result of the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. The most dramatic reductions in lead emissions occurred prior to 1990 due to the removal of lead from gasoline sold for most highway vehicles. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries in part due to national emissions standards for hazardous air pollutants (U.S. EPA 2013). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest level of Pb in the air is generally found near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases). Demolition of buildings containing lead-based paint is regulated by existing laws and regulations, including California Code of Regulations Title 17, Division 1, Chapter 8 and Senate Bill 460, to reduce or eliminate the risk to nearby receptors. Furthermore, the proposed Project does not include any stationary sources of lead emissions. Therefore, implementation of the Project would not result in substantial emissions of lead, and this pollutant is not discussed further in this analysis.
- *Toxic Air Contaminants.* Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness or that may pose a

present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engines that emit exhaust containing solid material known as diesel particulate matter (DPM; CARB 2011a). TACs are different than the criteria pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Current Air Quality

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and to determine whether ambient air quality meets the California and federal standards. The monitoring station closest to the Project site is the West Los Angeles-VA Hospital monitoring station, located at 304 Dowlen Drive in Los Angeles, approximately 1.0 mile southwest of the Project Site. However, particulate matter data is not recorded at this monitoring station. Therefore, PM_{10} and $PM_{2.5}$ data was sourced from the next closest monitoring station, the Los Angeles-North Main station located at 1630 North Main Street, located approximately 12.2 miles east of the Project Site. Table 4-2 indicates the number of days that each of the federal and state standards has been exceeded at these stations in each of the last three years. The data indicate that the federal and state eight-hour ozone standards were exceeded each year from 2016 to 2018, and the state worst hour ozone standard was exceeded in 2017. In addition, the state PM_{10} standard and the federal $PM_{2.5}$ standard were exceeded each year from 2016 to 2018. As shown in Table 4-2, no other state or federal standards for which pollutant concentrations were measured were exceeded at these monitoring stations. No stations in the vicinity of the Project site have monitored CO in the last four years. In 2012, the West Los Angeles-VA Hospital detected an eight-hour maximum CO concentration of 1.2 ppm, which is substantially below the state and federal standard of 9.0 ppm.

Table 4-2
Ambient Air Quality

Pollutant	2017	2018	2019
Ozone (ppm), Eight-Hour Average[1]	0.077	0.073	0.75
Number of days of state exceedances (>0.070 ppm)	3	2	1
Number of days of federal exceedances (>0.070 ppm)	3	2	1
Ozone (ppm), Worst Hour[1]	0.099	0.094	0.086
Number of days of state exceedances (>0.09 ppm)	1	0	0
Nitrogen Dioxide (ppm), Worst Hour[1]	0.0557	0.0647	0.0488
Number of days of state exceedances (>0.18 ppm)	0	0	0
Particulate Matter <10 microns ($\mu g/m^3$), Worst 24 Hours[2]	96.2	81.2	93.2
Number of days of state exceedances (>50 $\mu g/m^3$)	40	31	15
Number of days of federal exceedances (>150 $\mu g/m^3$)	0	0	0
Particulate Matter <2.5 microns ($\mu g/m^3$), Worst 24 Hours[2]	54.9	61.4	43.5
Number of days of federal exceedances (>35 $\mu g/m^3$)	6	6	1

[1] Data from the West Los Angeles-VA Hospital monitoring station.
[2] Data from the Los Angeles-North Main monitoring station.
Source: CARB 2020

Air Quality Management Plan

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in non-compliance. The SCAQMD updates the plan every three years. Each iteration of the SCAQMD's Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2016 AQMP, was adopted on March 3, 2017. It incorporates new scientific data and notable regulatory actions that have occurred since adoption of the 2012 AQMP, including the approval of the new federal eight-hour ozone standard of 0.070 ppm that was finalized in 2015. The Final 2016 AQMP addresses several state and federal planning requirements and incorporates new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and meteorological air quality models. The Southern California Association of Governments' (SCAG) projections for socio-economic data (e.g., population, housing, employment by industry) and transportation activities from the 2016-2040 RTP/SCS are integrated into the 2016 AQMP. This Plan builds upon the approaches taken in the 2012 AQMP for the attainment of federal PM and ozone standards and highlights the significant amount of reductions to be achieved. It emphasizes the need for interagency planning to identify additional strategies to achieve reductions within the timeframes allowed under the federal Clean Air Act, especially in the area of mobile sources. The 2016 AQMP also includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The AQMP also demonstrates strategies for attainment of the

new federal eight-hour ozone standard and vehicle miles travelled (VMT) emissions offsets, pursuant to recent U.S. EPA requirements (SCAQMD 2017).

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; people engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Therefore, the majority of sensitive receptor locations are schools, hospitals, and residences.

A majority of the Project Site is surrounded by sensitive receptors that could potentially be affected by air pollutant emissions associated with the proposed Project. These sensitive receptors include the multi-family residences at the Californian on Wilshire Apartments and the Wilshire Villa Apartments located immediately east of the Project Site, respectively; the multi-family residences at the Legacy at Westwood Apartments north of the Project Site across Wilshire Boulevard; and single-family residences immediately east, south, and southwest of the Project Site.

Impact Analysis

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

Less Than Significant Impact.

SCAQMD Air Quality Management Plan

The following analysis addresses the Project's consistency with the applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

Would the project result in any of the following:

- An increase in the frequency or severity of existing air quality violations; or
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?

Would the project exceed the assumptions utilized in preparing the AQMP?

- Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
- Does the Project include air quality mitigation measures; or
- To what extent is project development consistent with the AQMP control measures?

Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold 3.b below, localized concentrations of NO_X, CO, PM_{10}, and $PM_{2.5}$ have been analyzed for the Project. SO_2 emissions would be negligible during construction and long-term operations, and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities. The Project's PM_{10} and $PM_{2.5}$ emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM_{10} and $PM_{2.5}$. As shown in Table 4-4, the increases in PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site.

Additionally, the Project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table 4-4, NO_X and CO would not exceed the SCAQMD-recommended localized significance thresholds. Therefore, Project construction would not result in a significant impact with regard to localized air quality.

Because the Project would not introduce any substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations[7]. It is noted that NO_X can be a pollutant of concern, especially with projects with large numbers of vehicle trips. As discussed in Threshold 3.c, based on the low background level of CO in the Project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the Project's low level of operational CO emissions, the Project would not create new hotspots or contribute substantially to existing hotspots. In addition, as discussed in Threshold 3.c, the Project would not introduce a substantial number of vehicle trips generating a CO hotspot, and there are no existing intersections or areas in proximity to the Project Site requiring CO hotspot analysis. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

An analysis of potential localized operational impacts from on-site activities was also conducted. As shown in Table 4-5, localized NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ operational emissions do not exceed the SCAQMD-recommended significance thresholds and impacts would be less than significant.

Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

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7 *SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Plans, 1993*

Criterion 2

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016-2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: consistency with applicable population, housing, and employment growth projections; Project mitigation measures; and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

The applicable air quality plan is the SCAQMD 2016 AQMP. A project may be inconsistent with the AQMP if it would generate a considerable increase in regional air quality violations and affect the region's attainment of air quality standards, or if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016 AQMP incorporates local city general plans and socioeconomic forecast projections of regional population, housing and employment growth from SCAG and incorporated into SCAG's 2016-2040 RTP/SCS. Therefore, this analysis utilizes the growth projections in the 2016-2040 RTP/SCS.[8]

Regarding population, the Project involves the construction of a new Eldercare Facility that will provide new housing for elderly residents. Although the facility is primarily expected to draw residents from the current population, it could cause a direct increase in the City's population by introducing new residents to the Project Site. According to data provided by the California Department of Finance (DOF), the estimated current (2020) population of the City is 4,010,684.[9] The Project would include 123 single-occupancy assisted living and dementia care guest rooms, 40 two-bedroom independent living apartments, and 13 one-bedroom independent living apartments. Given the presumed single-occupancy limits of the assisted living/dementia care units and an average household size of 2.42 persons per household for the City of Los Angeles (applied to the independent living units), the Project would potentially house an estimated 252 residents (123 + [53 x 2.42]).[10] The estimate of potential future residents is conservative because the apartments would likely be occupied by fewer than 2.42 persons per unit given their nature as senior living units.

The Project may also cause an indirect increase in the City's population by providing new employment opportunities, which may result in the relocation of employees to the City. A total of 55 employees are anticipated to be on-site at the Eldercare Facility during the largest shift. Assuming conservatively that there are three eight-hour shifts and that 55 employees work each shift, the Eldercare Facility would employ approximately 165 people. In addition, the relocated and expanded Childcare Facility would require an additional seven staff members over the preschool's current staffing levels. Therefore, the Project is estimated to employ approximately 172 additional people. This analysis assumes that the construction of the replacement Church

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8 *Although the 2020-2045 SCAG RTP/SCS includes growth forecasts up to 2045, the 2016 AQMP incorporates local city general plans and socioeconomic forecast projections of regional population, housing and employment growth incorporated into SCAG's 2016-2040 RTP/SCS.*

9 *DOF 2020*

10 *Based on a 2.42 persons per household rate for multi-family units based on the 2017 American Community Survey 5-Year Average Estimate (2013–2017) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, July 31, 2019.*

offices would not result in a net increase in employment because it would be a relocation and replacement of the existing Church offices to be demolished. Assuming conservatively that all residents and employees relocate from outside the City of Los Angeles, the Project would result in 252 new residents and 172 new employees.

SCAG forecasts that the population of the City will increase to approximately 4,200,168 persons by year 2025 (year of Project buildout), which is an increase of 189,484 persons from the current population.[11] The addition of 252 residents in the Project area would constitute approximately 0.13 percent of the City's total projected population growth through year 2025. SCAG forecasts that the population of the City will increase to approximately 4,609,400 persons by year 2040, which is an increase of 598,716 persons from the current population.[12] The addition of 252 residents in the Project area would constitute 0.04 percent of the City's total projected population growth through year 2040. Therefore, the level of population growth associated with the proposed Project would be negligible and would not exceed official regional population projections. Moreover, the above analysis conservatively assumes that all Project residents are new to Los Angeles, whereas the more likely scenario is that many future Project residents already live in the City.

The increase of 172 employees in the City of Los Angeles would also be well within SCAG employment growth forecasts. SCAG forecasts that the number of jobs in the City in year 2025 would be approximately 1,915,868, an increase of 12.9 percent from year 2012. The addition of 172 employees in the Project area would constitute approximately 0.08 percent of the projected employment increase from year 2012 to 2025. SCAG forecasts that the number of jobs in the City will increase to approximately 2,169,100 by year 2040, which is an increase of 472,700 jobs from 2012. The addition of 172 jobs in the Project area would constitute 0.04 percent of the projected jobs increase through 2040. Because population and employment growth associated with the proposed Project would be within SCAG regional growth projections and, as discussed below, Project construction and operation would not generate significant air pollutant emissions, the proposed Project would not conflict with the AQMP.

- Does the Project implement feasible air quality mitigation measures?

As discussed in Thresholds 3.b and 3.c, below, the Project does not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment, nor does it expose sensitive receptors to substantial pollutant concentrations. Therefore, no mitigation measures are required, as no potential significant impacts have been identified. Furthermore, the Project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD, and consistent with the air quality mitigation measures identified in the 2016 SCAG RTP/SCS PEIR, as described below. The Project would incorporate project design features to support and promote environmental sustainability as discussed in Subsection 8, Greenhouse Gas Emissions. While these features are designed primarily to reduce greenhouse gas emissions, they would also serve to reduce the criteria air pollutants discussed herein, notwithstanding that no Project specific air quality or greenhouse gas impacts have been identified. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with AQMP control measures?

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use

[11] *SCAG 2016. Based on a linear interpolation of 2012-2040 data.*
[12] *SCAG 2016. Based on a linear interpolation of 2012-2040 data.*

programs, measures, and strategies. The SCAQMD combines its portion of the Plan with those prepared by SCAG. The RTP/SCS and Transportation Control Measures (TCMs), included as Appendix IV-C of the 2016 AQMP/SIP for the Basin, are based on SCAG's 2016-2040 RTP/SCS.

With regard to land use developments such as the Project, the 2016 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future growth within HQTAs and the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project represents an infill development within an existing urbanized area that would concentrate new residential and institutional uses within an HQTA. Therefore, the Project would be consistent with SCAG's 2016-2040 RTP/SCS, as it is located within an HQTA. As previously discussed, the Project Site is located approximately 900 feet from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA Station of Metro's Purple Line Extension which is currently scheduled to open in 2027. The Project would also include a minimum of 70 bicycle parking spaces (27 short-term and 43 long-term), and would encourage pedestrian activity by locating new residential and institutional uses on the Project Site within walking distance of existing office, institutional, entertainment, and neighborhood-serving commercial uses in the area. In addition, the Project would include electric vehicle infrastructure. As discussed in Subsection 17, Transportation, the Project is projected to have Household VMT per Capita of 6.0 and Work VMT per Employee of 2.9 (Appendix K-3 and K-4). which would not exceed the LADOT thresholds for Household VMT (7.4) and Work VMT (11.1). For Los Angeles County, the 2012 Base Year projected daily total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. The Project would result in fewer VMT than the LADOT and Los Angeles County projections.

This reduction in VMT is substantially better that the goals of the 2016–2040 RTP/SCS with an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.[13] Implementation of these features would contribute to a reduction in air quality emissions via a reduction in VMT. Accordingly, as the Project would support SCAG's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with the 2016 RTP/SCS (control measures of the AQMP).

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the SCAB. The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential and institutional uses within an HQTA, thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement regulatory measures for control of NO_X, PM_{10}, and $PM_{2.5}$. Also, the Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. As discussed above, the Project's would be consistent with the goals and policies of the AQMP and, therefore, is considered consistent with SCAQMD's AQMP.

[13] *CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016-2040 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's VMT and related GHG emission reduction goals.*

Consistency with City of Los Angeles Policies

The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. Table 4-3 summarizes the project's consistency with the applicable goals and objectives of the Air Quality Element.

Table 4-3
Project Consistency with Applicable Sustainable City Plan Measures

Goals and Objectives	Project Consistency
Objective 1.1. It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional AQMP, increase traffic mobility, and sustain economic growth citywide. **Objective 1.3.** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**No Conflict.** As discussed under Threshold 3.a, the project would be consistent with the SCAQMD's AQMP. In addition, as discussed under Threshold 3.b, particulate matter emissions (PM_{10} and $PM_{2.5}$) associated with project construction and operation would not exceed the regional thresholds or LSTs established by SCAQMD. To reduce particulate matter emissions during construction activities including grading and excavation, the project would be required to comply with SCAQMD Rule 403, which includes requiring contractors to minimize fugitive dust, reduce vehicle speeds and require watering activities.
Goal 2. Less reliance on single-occupant vehicles with fewer commute and non-work trips. **Objective 2.1**. It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No Conflict**. The Project is an infill development that is located in a HQTA as identified by SCAG. Specifically, the proposed Project would involve construction of an Eldercare Facility and Childcare Facility in an urbanized area that is well-served by public transit. The Project is located in an urbanized area and in close proximity to existing residential and commercial development. Existing public transit facilities are located within 500 feet of the Project site, including the Wilshire/Glendon stop for Route 20, Commuter Express 534, and Commuter Express 573. The Wilshire/Westwood stop for Metro Rapid 720 is approximately 800 feet from the Project site. In addition, the Wilshire/Westwood intersection will soon be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is currently under construction and currently scheduled to open in 2027. In addition, the Project site is directly adjacent to existing residential, commercial, and recreational development, including banks, theaters, a church, and other retail uses. Implementation of the proposed Project would place future residents in proximity to these businesses as well as facilitate use of active transportation to these uses. The Project would also include 27 short-term and 43 long-term bicycle parking spaces. Therefore, the Project would support the use of transit and active transportation by future residents, staff, and visitors as opposed to single-occupant vehicles.
Objective 3.1. It is the objective of the City of Los Angeles to increase the portion of work trips made by transit to levels that are consistent with the goals of the AQMP and the Congestion Management Plan. **Objective 3.2.** It is the objective of the City of Los Angeles to reduce vehicular traffic during peak periods.	**No Conflict**. The Project is an infill development that is located in a HQTA as identified by SCAG. Specifically, the proposed Project would involve construction of an Eldercare Facility and Childcare Facility in an urbanized area that is well-served by public transit. The Project is located in an urbanized area and in close proximity to existing residential and commercial development. Existing public transit facilities are located within 500 feet of the Project site, including the Wilshire/Glendon stop for Route 20, Commuter Express 534, and Commuter Express 573. The Wilshire/Westwood stop for Metro Rapid 720 is approximately 800 feet from the Project site. In addition, the Wilshire/Westwood intersection will soon be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is currently under construction and currently scheduled to open in 2027.

Goals and Objectives	Project Consistency
	Therefore, the Project would facilitate the use of transit by future staff commuting to work. Furthermore, as discussed in the Transportation Impact Study prepared for the Project (Appendix K-1), the Project would not result in significant impacts to volume-to-capacity ratios or level of service of the studied intersections during the AM or PM peak hours. Moreover, discussed in the VMT assessment prepared for the Project (Appendix K-3), the Project will not result in any VMT-related impacts. As a result, the Project would not interfere with the City's objective to reduce peak hour vehicle traffic.
Goal 4. Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality. **Objective 4.1**. It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning. **Objective 4.2.** It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.	**No Conflict.** As discussed under Thresholds 3.b and 3.c, emissions generated by project construction and operation would not exceed the regional thresholds or LSTs established by SCAQMD. Therefore, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment and would not interfere with regional attainment of ambient air quality standards. Furthermore, the Project is an infill development that is located in a HQTA as identified by SCAG. Specifically, the proposed Project would involve construction of an Eldercare Facility and Childcare Facility in an urbanized area that is well-served by public transit. The Project is located in an urbanized area and in close proximity to existing residential and commercial development. Existing public transit facilities are located within 500 feet of the Project site, including the Wilshire/Glendon stop for Route 20, Commuter Express 534, and Commuter Express 573. The Wilshire/Westwood stop for Metro Rapid 720 is approximately 800 feet from the Project site. In addition, the Wilshire/Westwood intersection will soon be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is currently under construction and is currently scheduled to open in 2027. In addition, the Project site is directly adjacent to existing residential, commercial, and recreational development, including banks, theaters, a church, and other retail uses. Implementation of the proposed Project would place future residents in proximity to these businesses as well as facilitate use of active transportation to these uses. The Project would also include 27 short-term and 43 long-term bicycle parking spaces. Therefore, the project would support the reduction of vehicle trips and vehicle miles traveled by facilitating the use of transit and active transportation to reach multiple destinations.
Goal 5. Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting. **Objective 5.1**. It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.	**No Conflict**. The Project would support this goal and policy because it would implement PDF-GHG-1, which entails achieving LEED Silver equivalency through energy efficiency measures and the use of water-efficient plantings.
Source: City of Los Angeles, 1992	

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to conflict with or obstruct implementation of the applicable air quality plan. Therefore, no mitigation measures are applicable. Moreover, as discussed in the impact analysis

above, the Project would not conflict with or obstruct implementation of the applicable air quality plan and impacts would be less than significant.

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

Less Than Significant Impact. The following analysis evaluates air pollutant emissions generated by Project construction and operation in light of the regional significance thresholds established by SCAQMD in the *CEQA Air Quality Handbook*, as well as the SCAQMD Localized Significance Thresholds (LSTs), which the City of Los Angeles has elected to utilize as its quantitative thresholds of significance. A full discussion of criteria pollutants and relevant thresholds applicable to the Project are provided in the Project's AQ/GHG Report, attached as Appendix D.

Construction Emissions

Project construction was modeled to last approximately 35 months, which would generate temporary air pollutant emissions during the various construction phases of the Project.[14] These impacts are associated with fugitive dust and exhaust emissions from heavy construction vehicles, as well as volatile organic compounds (VOCs)[15] released during the application of architectural coatings. Grading, excavation, hauling, and site preparation would involve the greatest use of heavy equipment and generation of fugitive dust. Approximately 62,000 cubic yards of soil would be exported to the Chiquita Canyon Landfill over approximately 93 days with 50 loaded haul truck trips occurring per day.

Table 4-4 summarizes the estimated maximum daily emissions (lbs/day) of pollutants associated with construction of the proposed Project. Emissions modelling accounts for compliance with SCAQMD Rule 403, which regulates fugitive dust emissions during demolition, grading, and construction activities to minimize emissions of PM_{10} and $PM_{2.5}$; SCAQMD Rule 1113, which regulates the VOC content of architectural coatings to minimize emissions during construction activities; and SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation, which restrict visible emissions and diesel equipment emissions, respectively. The Project would be required to comply with Section 2485 of Title 13 of the California Code of Regulations, which states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location, and Rule 1121, which specifies NO_X emission limits from residential type, natural-gas fired water heaters (See AQ/GHG report in Appendix D for a full discussion of SCAQMD rules and other regulations).

As shown below, construction of the Project would not exceed SCAQMD's regional significance thresholds or LSTs. As such, no significant impacts requiring Project specific mitigation measures

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[14] *Post-constructions/pre-operation activities associated with system testing, system commissioning/punchlist, final inspections, and certificate of occupancy for both phases would primarily be completed within the enclosed building using small hand tools, and would not involve the use of large construction equipment generating which generate air quality pollutant emissions. Therefore, the construction air quality modeling does not include these activities. Although the construction schedule in the project description is listed as 41 months, which is longer than the 35 months assumed in the modeling, the same overall intensity of emission-producing construction activities has been analyzed, such that a longer schedule would result in lower maximum daily air quality emissions.*

[15] *Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

are required. Furthermore, as described above, the Project would comply with applicable regulatory requirements intended to control emissions, which is consistent with applicable air quality mitigation measures that have been identified by the 2016-2040 SCAG RTP/SCS PEIR to reduce maximum daily VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ emissions. Because air pollutant emissions generated by Project construction would not exceed SCAQMD's regional significance thresholds or LSTs, Project construction would not contribute substantially to an existing or projected air quality violation and impacts would be less than significant.

Table 4-4
Estimated Maximum Construction Emissions

	Maximum Emissions (lbs/day)					
Construction Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2021	4.8	51.2	47.4	0.1	4.9	2.4
2022	6.7	61.2	58.3	0.2	7.9	2.7
2023	8.0	44.5	47.8	0.2	7.2	2.4
2024	8.6	40.4	56.5	0.1	5.7	2.5
Maximum Regional Emissions (lbs/day)	**8.6**	**61.2**	**47.4**	**0.2**	**7.9**	**2.7**
SCAQMD Regional Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Emissions (lbs/day)	**7.3**	**41.3**	**46.1**	**0.1**	**1.7**	**1.6**
SCAQMD Localized Significance Thresholds (LSTs)[1]	*N/A*	*129*	*721*	*N/A*	*5*	*4*
Threshold Exceeded?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

Notes: All emissions modeling was completed using CalEEMod. See Appendix D in attached AQ/GHG Report for modeling results. Some numbers may not add up due to rounding. Emission data is pulled from CalEEMod's "mitigated" results, which is a term of art for the modeling output and is not equivalent to mitigation measures that may apply to the CEQA impact analysis. The CalEEMod "mitigated" results account for compliance with regulations and GHG-related Project design features (See Subsection 8, Greenhouse Gases for more details). Emissions presented are the highest of the winter and summer modeled emissions.
[1] LSTs are for a 1.6-acre Project in SRA 2 within a distance of 82 feet from the site boundary. LSTs were estimated using linear regression based on one- and two-acre LSTs.

Operational Emissions

Table 4-5 summarizes the Project's net operational emissions associated with the proposed Eldercare Facility and Childcare Facility by source, taking into account removal of existing emissions from the Church preschool and single-family residence. The majority of Project-related operational emissions would result from vehicle trips to and from the site. As shown below, the net increase in emissions as a result of the Project at its buildout year would not exceed SCAQMD regional thresholds for criteria pollutants; therefore, the operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and impacts would be less than significant.

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non- attainment. As shown in Table 4-4 and Table 4-5, Project construction and operational daily emissions at the Project Site would not exceed any of the SCAQMD's regional thresholds, respectively. Therefore, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, therefore, would be less than significant. Similarly, as analyzed below, construction and operation of the Project would have less-than-significant impacts with regard to localized emissions as well. Therefore, the Project's contribution to localized cumulative air quality impacts also would not be cumulatively considerable and, thus, would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to air quality. These include Mitigation Measure AIR-2(b), listed in detail in Section 3.3 of this SCEA, which identifies project-level feasible measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies to reduce construction emissions. Many of these measures identified by Mitigation Measure AIR-2(b) align with existing regulatory requirements that the Project would be subject to, including fugitive dust controls of SCAQMD Rule 403, VOC regulations of SCAQMD Rule 1113, diesel-fueled vehicle regulations of SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation, and commercial vehicle idling limits of Section 2485 of Title 13 of the California Code of Regulations. The CalEEMod air quality modeling prepared for the Project (see Appendix D to this SCEA) assumes the Project's compliance with SCAQMD Rule 403 and other relevant regulatory requirements, and as described above and as shown in the CalEEMod output tables, the Project would not result in VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ emissions during construction or operation that would exceed SCAQMD regional thresholds or localized significance thresholds (LSTs). Therefore, through compliance with applicable air quality regulatory requirements that are consistent with the measures identified by Mitigation Measure AIR-2(b), the Project would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant.

Table 4-5
Operational Emissions

	Maximum Daily Emissions (lbs/day)					
Emission Source	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	5.0	3.1	15.8	< 0.1	0.3	0.3
Energy	< 0.1	0.4	0.2	< 0.1	< 0.1	< 0.1
Mobile	1.2	5.5	15.6	0.1	5.8	1.6
Project Emissions	6.2	9.0	31.6	0.1	6.2	1.9
Existing Emissions	1.0	3.0	6.7	< 0.1	1.4	0.4
Net Change in Emissions (Project – Existing)	**5.2**	**6.0**	**24.9**	**0.1**	**4.8**	**1.5**
SCAQMD Regional Thresholds	*55*	*55*	*550*	*150*	*150*	*55*

	Maximum Daily Emissions (lbs/day)					
Emission Source	**VOC**	**NO_x**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Notes: All emissions modeling was completed using CalEEMod. For modeling results, See Appendix D - AG/GHG Report. Some numbers may not add up due to rounding. Emission data is pulled from CalEEMod's "mitigated" results which is a term of art for the modeling output and is not equivalent to mitigation measures that may apply to the CEQA impact analysis. The CalEEMod "mitigated" results include compliance with regulations and Project design features that will be included in the Project. Emissions presented are the highest of the winter and summer modeled emissions.						

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

Less Than Significant Impact.

Criteria Air Pollutants

The SCAQMD has developed LSTs, which represent the maximum emissions from a Project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and Project size. LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway.[16] As such, LSTs are typically applied only to construction emissions because the majority of operational emissions are associated with Project-generated vehicle trips.

As discussed under Threshold 3.b and shown in Table 4-4, Project construction emissions would not exceed the SCAQMD LSTs for any criteria pollutant. Therefore, the Project would not expose sensitive receptors to substantial criteria pollutant concentrations.

Toxic Air Contaminants (TACs)

Construction Impacts

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person 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, the proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions or corresponding individual cancer risk are anticipated after Project construction is complete. In addition, as discussed under Threshold 3.b, maximum daily on-site construction emissions would not exceed SCAQMD localized screening thresholds. Therefore, the Project's off-site construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

[16] *SCAQMD. 2008. Final Localized Significance Threshold Methodology. June 2003. Revised July 2008.*

Operational Impacts

California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005). Together, the CARB and SCAQMD guidelines recommend siting distances both for the development of sensitive land uses in proximity to TAC sources and for the addition of new TAC sources in proximity to existing sensitive land uses. The primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers and emergency generators). However, these activities, and the residential and institutional land uses associated with the Project, do not generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery, etc.). It is expected that the quantities of hazardous TACs generated on-site (e.g., those associated with cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program.

Because the Project would not include substantial TAC sources, the Project would not result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic or toxic air contaminants.

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

Local Carbon Monoxide Hotspot Impact

A carbon monoxide (CO) hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 ppm or the federal and state eight-hour standard of 9.0 ppm.[17]

A detailed CO analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue on the west side of Los Angeles near the I-405 Freeway. The concentration of CO at this intersection was 4.6 ppm, which is well below the state and federal standards. The Wilshire Boulevard/Veteran Avenue intersection has an ADT of approximately 100,000 vehicles per day.

The total ADT for Wilshire Boulevard, east of Westwood Boulevard was measured at 38,960 vehicles (Appendix J, Appendix K-1). The proposed project would add approximately 732 trips on the busiest day (Appendix K-1). Assigning all these trips to Wilshire Boulevard would result in a conservative assumption of 39,692 vehicle trips on the roadway, which is much less than the

[17] *California Air Resources Board. 2016. Ambient Air Quality Standards*

100,000-vehicle count on the Wilshire Boulevard/Veteran Avenue intersection, which as noted above, is itself well below the standards. Furthermore, due to stricter vehicle emissions standards in newer cars and new technology that increases fuel economy, CO emission factors under future land use conditions would be lower than those under existing conditions. Thus, even though there would be more vehicle trips under the proposed Project than under existing conditions, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the one-hour or eight-hour CO standard.

The 2016-2040 RTP/SCS PEIR identified Mitigation Measure AIR-4(b), listed in detail in Section 3.3 of this SCEA, which includes measures that are designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment in connection with 2016-2040 RTP/SCS transportation projects. As the Project is not a 2016-2040 RTP/SCS transportation project, Mitigation Measure AIR-4(b) would not be applicable. Moreover, as discussed in the impact analysis above, the Project would not expose sensitive receptors to substantial pollutant concentrations, during construction or operation phases of the Project. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The Project would generate oil or diesel fuel odors during construction from equipment as well as odors related to asphalt paving. The odors would be limited to the construction period and would be temporary. With respect to operation, the SCAQMD's *CEQA Air Quality Handbook* (1993) identifies land uses associated with odor complaints to be agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Residential and institutional uses are not identified on this list. Furthermore, no odor-producing uses are located in the Project vicinity. In addition, the Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to expose substantial numbers of people to objectionable odors. Therefore, no mitigation measures are applicable. As discussed in the impact analysis above, the Project would not generate objectionable odors during construction or operation affecting a substantial number of people and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Based on SCAQMD guidance,[18] individual projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction- and operational-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to

[18] *SCAQMD. 1993. Air Quality Handbook; SCAQMD. 2003. White Paper on potential Control Strategies to Address Cumulative Impacts from Air Pollution.*

cumulative air quality impacts would also not be cumulatively considerable and therefore would be less than significant.

Similar to the Project, the greatest potential for TAC emissions with respect to each of the related projects would generally involve diesel particulate emissions associated with heavy equipment operations during demolition and grading/excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk," or the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities with respect to the Project and each related project would not result in a long-term (i.e., 70-year) substantial source of TAC emissions. In addition, SCAQMD's *CEQA Air Quality Handbook* and supplemental online guidance/information do not require a health risk assessment for short-term construction emissions. It is therefore not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations.

With respect to TAC emissions, neither the Project nor any of the related projects (which are largely residential, retail/commercial, and office in nature), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. Per the SCAQMD Mates IV Estimated Risk Maps, the Project Site is located in an area with a calculated cancer risk of approximately 1,000 in a million.[19] The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., the US-101 freeway). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles. Pursuant to Assembly Bill 1807, which directs CARB to identify substances as TACs and adopt measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Air Basin-wide TAC emissions reductions. In addition, the Project would not result in any substantial sources of TACs that have been identified by CARB, and thus, would not result in a cumulatively considerable impact or a cumulatively significant impact. As such, cumulative TAC emissions during both construction and long-term operations would be less than significant.

[19] *SCAQMD. Web Map. Mates IV Estimated Risk Maps. Accessible at: https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f*

4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game 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 Game 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?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project Site is located in an urbanized area of the City. The Project Site and surrounding properties have been largely developed with commercial and residential land uses. The Site is entirely paved and is developed with the Church Sanctuary, Fellowship Hall, administrative offices, preschool, and a single-family residence, as well as a surface parking lot. Landscaping within the Project Site is limited, consisting of 31 on-site trees,

three street trees along Wilshire Boulevard, shrubs, and a grass area. A portion of the adjacent parcel to the west of the Project Site (cemetery and memorial park) has a land use designation of open space; however, despite this designation, there is minimal value as a natural habitat, as the Project Site functions as a cemetery/mausoleum, contains numerous paved paths/driveways, receives high volumes of visitors, and is bordered on all sides by residential and commercial development.

Due to the developed nature of the Project Site and surrounding urban areas, and the lack of undeveloped open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Due to the lack of suitable habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife[20] or by the U.S. Fish and Wildlife Service[21] would be present on-site.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measure BIO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures that are capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species. As discussed in the impact analysis above, the Project Site lacks suitable habitat for candidate, sensitive or special status species, and there is no potential for an impact to these biological resources. Therefore, measures included in Mitigation Measure BIO-1(b) are not applicable to the Project and impacts would be less than significant.

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

No Impact. The Project Site is located in an urbanized area and is developed with the Church Sanctuary, Fellowship Hall, administrative offices, preschool, and a single-family residence, as well as a surface parking lot. The Project Site is not located in or adjacent to a Biological Resource Area[22] or Significant Ecological Area[23] as defined by the City or County of Los Angeles. In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service[24,25].

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measure BIO-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures that are capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies,

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[20] *California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.*

[21] *U.S. Fish and Wildlife Services, ECOS Environmental Conservation Online System, Listed species believe to or known to occur in Los Angeles County, accessed December 16, 2019.*

[22] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B.*

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

[24] *California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed December 17, 2019.*

[25] *U.S. Fish and Wildlife Service, National Wetlands Inventory, https://www.fws.gov/wetlands/data/Mapper.html, accessed December 17, 2019.*

and/or Lead Agencies. As discussed in the impact analysis above, the Project Site lacks riparian habitat or other sensitive natural communities and there is no potential for an impact to these biological resources. Therefore, measures included in Mitigation Measure BIO-1(b) are not applicable to the Project and no impact would occur.

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. The Project Site is located in an urbanized area and is developed with the Church Sanctuary, Fellowship Hall, administrative offices, preschool, and a single-family residence, as well as a surface parking lot. As stated above under Threshold 4.b, no riparian habitats or other sensitive natural communities are on or adjacent to the Project Site. The Project Site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act.[26]

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measures BIO-1(b), BIO-2(b), and BIO-3(b), listed in detail in Section 3.3 of this SCEA, which identify measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. As discussed in the impact analysis above, the Project Site does not contain any federally protected wetlands, wetland resources, or other waters of the United States as defined by Section 404 of the Clean Water Act, and there is no potential for an impact to these biological resources. Therefore, the measures included in Mitigation Measures BIO-1(b), BIO-2(b), and BIO-3(b) are not applicable to the Project, and no impact would occur.

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is developed with a variety of uses. Landscaping within the Project Site is limited, consisting of 31 on-site trees, three street trees, shrubs, and a grass area. Additionally, the area surrounding the Project Site is fully developed, and there are no large expanses of undeveloped open space within and surrounding the Project Site, that provide linkages to natural open space areas that may serve as a wildlife corridor. A portion of the adjacent parcel to the west of the Project Site (cemetery and memorial park) has a land use designation of open space; however, despite this designation, there is minimal value as a natural habitat, as the site functions as a cemetery/mausoleum, contains numerous paved paths/driveways, receives high volumes of visitors, and is bordered on all sides by residential and commercial development. Furthermore, as stated above under Threshold 4.b, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.

As discussed in the Tree Report prepared for the Project, included as Appendix B of this SCEA, construction of the Project would remove two of the three street trees along Wilshire Boulevard and all of the 31 on-site trees. While these trees could potentially provide nesting sites for migratory birds, the Project would be required to comply with the Migratory Bird Treaty Act

[26] *U.S. Fish and Wildlife Service, National Wetlands Inventory, https://www.fws.gov/wetlands/data/Mapper.html, accessed December 17, 2019.*

(MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter of any migratory bird, or the parts, nests, or eggs of such a bird expect under the terms of a valid permit issued pursuant to federal regulations.

To ensure compliance with the MBTA, surveys are required to determine if nests would be disturbed and, if so, a buffer area with a specified radius around the nest must be established so that no disturbance or intrusion occurs until the young have fledged and left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgement of the monitoring biologist, in coordination with the California Department of Fish and Wildlife. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto."

To ensure regulatory compliance with the MBTA and California Fish and Game Code (CFGC), it would be required that tree removal activities associated with the Project take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the MBTA, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measures BIO-1(b), BIO-2(b), BIO-3(b) (discussed above), as well as BIO-4(b), listed in detail in Section 3.3 of this SCEA, and which identifies measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. As discussed in the impact analysis above, the Project would comply with the MBTA and applicable provisions of the CFGC, and pursuant to this regulatory compliance, no Project-specific impacts related to nesting birds would occur. Since the Project would not have the potential to 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, and incorporates regulatory compliance measures that are equal to or more effective than relevant measures under MM BIO-1(b) through BIO-4(b), impacts would be less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. As discussed in the Tree Report prepared for the Project, included as Appendix B of this SCEA, construction of the Project would remove two of the three street trees along Wilshire Boulevard and all of the 31 on-site trees. One of the on-site trees (a Western sycamore) to be removed is considered a protected tree under the City's Protected Tree Ordinance (Ordinance No. 177,404), which regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. Trees that have been planted as part of a tree planting program are exempt from the ordinance and are not

considered protected. The Protected Tree Ordinance prohibits the removal of any regulated protected tree without a permit, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety. Pursuant to current City policy, replacement of protected trees must currently be performed on a 4:1 basis.

The proposed removal of the two street trees will require approval of a street tree removal permit from the City's Board of Public Works, and replacement with new street trees at a 2:1 ratio. Replacement trees would be planted in compliance with all City regulations and policies, which include the Specific Plan's requirement that street trees must be 48" box minimum size and be spaced at 30-foot intervals to the satisfaction of the City's Urban Forestry Division. However, although four street trees are required pursuant to all applicable regulations, the Urban Forestry Tree Spacing Guidelines require offsets from street lights, crosswalks, etc., and compliance with these Guidelines do not permit more than three additional street trees to be planted along the Project Site's frontage. Because of this, through consultation with Urban Forestry, the Applicant will be required to choose another location to plant the 4th street tree. The Project will also provide one new tree (either an on-site tree or a street tree) for every four dwelling units, in compliance with LAMC Section 12.21 G.2(a)(3). Through required compliance with the Protected Tree Ordinance and applicable Urban Forestry policies, the proposed Project would not conflict with local policies protecting biological resources, and impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measures BIO-1(b), BIO-2(b), BIO-3(b), and BIO-4(b) (as discussed above), as well as BIO-5(b), listed in detail in Section 3.3 of this SCEA, and which identifies measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Specifically, Mitigation Measure BIO-5(b) includes the following measures pertaining to protected trees that would be applicable to the Project:

- Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.
- If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species.
- Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
    - Avoidance strategies
    - Contribution of in-lieu fees
    - Planting of replacement trees at a minimum ratio of 2:1
    - Re-landscaping areas with native vegetation post-construction
    - Other comparable measures

As discussed in the impact analysis above, the Project would be required to adhere to the City's Protected Tree Ordinance, street tree removal permit requirements, and Urban Forestry policies regarding the removal and replacement of the existing protected and non-protected trees. These existing applicable City regulations are equal to or more effective than the above measures of Mitigation Measure BIO-5(b), and therefore, pursuant to the Project's required regulatory compliance, impacts would be less than significant.

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

No Impact. The Project Site is located in an urbanized area. As previously described, landscaping within the Project Site is limited, consisting of consisting of 31 on-site trees and three street trees, shrubs, and a grass area. As described above under Thresholds 4.b and c, the Project Site does not support any habitat or natural community. The Project Site is not located in an area that is subject to an adopted conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.[27,28] As noted under Threshold 4.a above, although the property to the west of the Project Site has a land use designation of Open Space, there is minimal value as a natural habitat, as the site functions as a cemetery/mausoleum, contains numerous paved paths/driveways, receives high volumes of visitors, and is bordered on all sides by residential and commercial development.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include Mitigation Measures BIO-1(b) through BIO-5(b) (as discussed above), as well as BIO-6(b), listed in detail in Section 3.3 of this SCEA, and which identifies measures capable of avoiding or reducing the significant impacts on Habitat Conservation Plans and Natural Community Conservation Plans that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As discussed in the impact analysis above, the Project Site is not located in an area that is subject to an adopted conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan, and accordingly, there is no potential for conflict with any such plan. Therefore, the measures included in Mitigation Measures BIO-1(b) through BIO-6(b) are not applicable to the Project, and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Neither the Project Site nor any of the related project sites are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts to these types of designated areas would occur. The Project and the related projects would comply with applicable regulatory requirements regarding biological resources and protected species, including the MBTA and the City's regulations regarding protected trees and

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[27] *Conservation Element of the City of Los Angeles General Plan. 2001a. http://planning.lacity.org/cwd/gnlpln/consvelt.pdf*

[28] *Environmental Conservation Online System. 2017. Habitat Conservation Plans. http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP. Accessed April 2018.*

the removal of street trees. Therefore, no cumulative impacts regarding protected species would occur.

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4.5 CULTURAL RESOURCES

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

The analysis of potential impacts to historic and archaeological resources is based on the Belmont Village Senior Living Westwood II Historic Resource Assessment Report (Historic Resources Assessment), dated June 2020 and a Tribal Cultural Resources Report, dated June 2020, which are included as Appendix E and Appendix M of this SCEA.

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

Less Than Significant Impact with Mitigation Incorporated.

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

On-Site Resources

The Project Site is located in an urbanized area of Los Angeles. The Project Site and surrounding properties have been largely developed with commercial and residential land uses. Existing structures on the Project Site include the Church Sanctuary, Fellowship Hall, Church office/preschool buildings, and a single-family residence. As determined in the Project's Historic Resources Assessment and as summarized below, the Sanctuary is the only historical resource identified on the Project Site. The remaining buildings were found ineligible for national, state, or local landmark listing, either individually or as contributors to a historic district. These additional buildings, which would be demolished as part of the Project, are therefore not considered historical resources pursuant to CEQA.

Sanctuary

The Sanctuary was constructed in 1952, and has been found eligible for listing in the National Register of Historic Places (NRHP), California Register of Historic Places (CRHP), and as a City of Los Angeles Historic Cultural Monument (HCM) under the context of Architecture and Engineering, 1850-1980. Through SurveyLA, a historic resources survey of the City of Los

Angeles, the Sanctuary was found to be an "excellent example of Late Gothic Revival religious architecture in Westwood," qualifying under Criteria C/3/3 at the national, state, and local levels.[29] Criterion C details the quality of significance in resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

As described in the Historic Resources Assessment, the Sanctuary consists of a three-part design, with a higher central wing flanked by two lower wings. The two lower wings, both of which are considered of primary character-defining significance, would remain intact and would not be altered through the Project. The Project does not propose any alterations to the principal elevation or side elevations of the Sanctuary, with the exception of the removal of a non-character defining wood trellis and office addition that was constructed on the side elevation in 2006.

The other Church-affiliated buildings adjacent to the Sanctuary were developed over a span of 56 years, beginning with a former real estate office building being moved onto the Project Site in 1950 and altered for use as a temporary chapel, then further extensively altered 23 years later (today, it is the Church's Fellowship Hall). Following the construction of the Sanctuary in 1952, the preschool building was added along the Sanctuary's south elevation in or around 1956, an existing patio was enclosed to create a meeting room in 1994, and a two-story office addition was built along the Sanctuary's southeast end and a patio and trellis were constructed against the Sanctuary's east elevation in 2006. As a result of this intermittent development, the Church's northern campus does not have a cohesive design, and the property does not reflect any particular era of the community's development. Moreover, the preschool building and office addition do not embody the distinctive characteristics of any architectural style, and the Fellowship Hall lacks integrity from its original appearance due to a complete remodeling of the building façade in 1973.

Furthermore, as an intact but common residential type and style within Westwood, the single-family residence at 10812 Ashton Avenue does not appear to meet the City's SurveyLA eligibility criteria for historic designation as an individual resource, nor was it found to be eligible for direct associations with significant historic events, or for broad patterns in history, or for direct associations with persons significant in our past.

Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. As noted above and discussed in detail in the Historic Resource Assessment, the Project does not propose alterations to the principal elevation or side elevations of the Sanctuary, which is the only identified historic resource at the Project Site. Accordingly, the Historic Resource Assessment concluded that following Project implementation, the Sanctuary would retain sufficient integrity to continue to convey its historic associations and as such would remain eligible as a historic resource.

Off-Site Resources

Pierce Brothers Westwood Village Memorial Park and Mortuary (identified by the City as Westwood Village Memorial Park, and designated as HCM #731) is a cemetery and mortuary containing several mausoleum structures along the shared property line of the Project Site's

[29] *City of Los Angeles, Office of Historic Resources, SurveyLA Westwood Report, Individual Resources, p.65.*

western boundary. As a designated HCM, it is therefore a historical resource pursuant to CEQA. Due to the close proximity of the Project to the mortuary, the potential exists for both indirect and direct impacts to occur. However, regarding potential indirect impacts, because the area surrounding the cemetery is already extensively developed with high- and mid-rise residential and commercial structures, the proposed Project would not introduce any incompatible visual elements that would result in any negative indirect effect to the resource's setting, or any other effect that could result in the resource being no longer being eligible.

In regards to direct impacts, due to the close proximity of Project construction to the mortuary, vibration levels from construction equipment have the potential to result in damage to the structures, thus potentially affecting the integrity and eligibility as a historic resource.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to cultural resources, including historical resources. These include Mitigation Measure CUL-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Specifically, Mitigation Measure CUL-2(b) identifies the following measures pertaining to the evaluation and protection of potential historic resources that would be applicable to the Project:

- Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
- Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.

Consistent with these measures, a Historic Resources Assessment of the Project Site and surrounding properties was prepared by a qualified architectural historian and included the results of a record search regarding existing historic resources. As described above, the Historic Resources Assessment concluded that the existing Sanctuary is the only extant historic resource on the Project Site, and that this resource would not be impacted or impaired by the Project. In addition, as described under Threshold 8b under Subsection 13, Noise of this SCEA, the Sanctuary would be protected during Project construction (including excavation of the Project's subterranean garage) through implementation of a vibration damage protection plan, which is included as an appendix to the Noise and Vibration Technical Report (Appendix J to this SCEA). Therefore, following the preparation of the Historic Resources Assessment and incorporation of measures that are consistent with the measures identified under Mitigation Measure CUL-2(b), no impacts to on-site historic resources would occur.

Regarding potential impacts to off-site historic resources, consistent with Mitigation Measure CUL-2(b), the adjacent historic mortuary structures would be protected during Project construction pursuant to mitigation measures MM-N-4 through MM-N-6 that are included in Subsection 13, Noise, under Threshold 13.b of this SCEA. As described therein, these mitigation measures have been developed after considering the specific characteristics of the mortuary structures and their proximity to anticipated construction activities, and their implementation would ensure that groundborne vibration emanating from Project construction equipment does not affect the integrity of the off-site structures. With implementation of these mitigation measures, which are equal to or more effective than the measures identified by Mitigation Measure CUL-2(b) for the purpose of assessing and protecting potential historic resources, potential impacts to off-site historic resources would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in an urbanized area and has been previously disturbed in conjunction with existing improvements on the Project Site. Specifically, as noted in the Geotechnical Investigation, included in Appendix F, fill soils up to about six and a half feet thick are present over most of the Project Site, indicating prior Project Site grading activities. Therefore, the topmost layers of soil on the Project Site are not likely to contain substantive archaeological resources. Moreover, the likelihood that intact archaeological resources are present on the Project Site is low, because as described in the Historic Resources Assessment included as Appendix E, no archaeological resources (prehistoric or historic) have been documented at the Project Site pursuant to California Historical Resources Information System (CHRIS) and/or South Central Coast Information Center (SCCIC) record searches completed for the Project. Additionally, a review of the State Historic Property Data Files, National Register of Historic Places, California Historical Landmarks, California Points of Historic Interest, California Office Historic Places Archaeological Determinations of Eligibility, and the Caltrans State and Local Bridge Surveys was conducted and while numerous cultural resource studies have been completed in the vicinity of the Project Site (largely in connection with proposed rail line extension projects along Wilshire Boulevard), no documented resources have been identified at or adjacent to the Project Site.

Notwithstanding, construction of the Project would include a three-level subterranean parking garage that would require excavation to previously undisturbed depths up to 43 feet below the surface to accommodate construction of the underground parking structure.

Project-related grading and excavation activities could disturb unknown archaeological resources buried on-site and thus, the possibility of encountering such resources exists and impacts could be potentially significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to cultural resources, including archaeological resources. These include Mitigation Measure CUL-2(b), listed in detail in Section 3.3 of this SCEA, which identifies mitigation measures capable of avoiding or reducing the significant effects of on archaeological resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Specifically, Mitigation Measure CUL-2(b) includes the following recommended measures that are relevant to the Project:

- Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified.
- Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.
- Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.
- Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.

Consistent with the above measures, a Historic Resources Assessment of the Project Site and surrounding properties was prepared and included the results of a record search regarding existing cultural resources, including archeological resources. As described above, the Historic Resources Assessment concluded that no archaeological resources have been identified on or in proximity to the Project Site. Because no resources have been identified, no specific avoidance measures are warranted. However, to address the potential for encountering previously unidentified resources during ground-disturbing activities, MM-CR-1 has been prepared, which provides a process for evaluating and, as necessary, avoiding impacts to any identified resources. Because MM-CR-1 specifically addresses the potential for inadvertent discovery of archaeological resources at the Project Site, it is equal to or more effective than relevant measures under Mitigation Measures CUL-2(b), and with its incorporation, potential impacts to archaeological resources will be less than significant.

Mitigation Measures

MM-CR-1 **Archaeological.** A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities

may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

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

Less Than Significant Impact. A significant impact may occur if previously deposited human remains would be disturbed during excavation of the Project Site. No burial sites or human remains are known to exist on the Project Site. While no formal cemeteries, other places of human interment, or burial grounds or sites are known to exist on the Project Site and although the likelihood of their existence is low due to previous on-site ground disturbing activities, a cemetery is located directly adjacent to and west of the Project Site; therefore, there is a possibility that human remains may be encountered during excavation.

If encountered, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition, pursuant to California Public Resources Code Section 5097.98. If the Coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains to be those of Native American, he or she shall consult with the native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by NAHC. Compliance with these existing regulations would reduce any potential impacts to a less than significant level.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to the disturbance of human remains. These include Mitigation Measure CUL-4(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Specifically, these measures include the following:

- In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- If any discovered remains are of Native American origin:
    - Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.
    - If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any

associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur:

- The Native American Heritage Commission is unable to identify a descendent;
- The descendant identified fails to make a recommendation; or
- The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

The above measures are addressed by existing regulatory requirements. Specifically, if human remains are encountered, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition, pursuant to California Public Resources Code Section 5097.98. If the Coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains to be those of Native American, he or she shall consult with the native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by NAHC. Compliance with these existing regulations would reduce any potential impacts to a less than significant level. With compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure CUL-4(b), impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Although impacts to historic resources tend to be site-specific, cumulative impacts could occur if the Project and related projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project. As discussed above, the Project would not result in any direct or indirect impacts to historical resources. Furthermore, the Project would not substantially change the existing look and feel of the surrounding area to the extent that the significance of any nearby historical resource would be impaired. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological resources. Therefore, cumulative impacts to archaeological resources and human remains would be less than significant and would not be cumulatively considerable.

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4.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

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

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

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

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

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

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

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

e) The effects of the project on energy resources;

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

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

h) Whether the Project conflicts with adopted energy conservation plans.

With regard to Threshold 6.b, the Project will be evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed in Subsection 8, Greenhouse Gas Emissions, of this SCEA, the Project would also be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

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

Less Than Significant Impact. The following analysis considers the eight criteria (a through h) identified in the discussion above to determine whether Threshold (a) would be exceeded.

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

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

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

Construction Impacts

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new building, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in Table 4-6 and as discussed further below, Project construction would consume approximately a total of 236,071gallons of gasoline, and 256,356 gallons of diesel.

Table 4-6
Proposed Project Construction Energy Usage

Source	Fuel Consumption (Gallons)	
	Gasoline	Diesel
Construction Equipment, Vendor & Hauling Trips	–	256,356
Construction Worker Vehicle Trips	236,071	–
See Appendix D for CalEEMod default values for fleet mix and average distance of travel and for energy calculation sheets.		

Electricity

During construction of the Project, water for dust control would likely be dispersed using water trucks with built-in pump systems, which would not generate electricity demand. Electricity would be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. However, Project construction is anticipated to occur predominantly during daytime hours and would not require substantial electricity for site lighting. Electricity for other construction activities supplied to the Project Site by LADWP and would be obtained from the existing electricity infrastructure that connects to the Project Site. This would be consistent with suggested measures in the Threshold Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Project construction electricity use would be infrequent and sporadic, and therefore not easily quantifiable. Due to the infrequent and sporadic nature, it would be negligible compared to other construction and operational energy use.

Natural Gas

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

Transportation Energy

The petroleum-based fuel use summary provided above by Table 4-6 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 236,071 gallons of gasoline and approximately 256,356 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.006 percent of the 2018 annual on-road gasoline-related energy consumption and 0.1 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County.[30]

Operational Impacts

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery.

[30] *California Energy Commission. 2010-2018 Gasoline and Diesel Sales. Available from: https://www.energy.ca.gov/media/3874. Accessed June 2020.*

Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table 4-7, the Project's net demand for electricity would be approximately 1,214,471 kWh per year. As shown in Table 4-8, the Project's net demand for natural gas would be 1,807,903 kBTU per year. As shown in Table 4-9, the Project's net demand for gasoline and diesel would be 49,032 and 12,041 gallons per year, respectively.

Table 4-7
Proposed Electricity Demand

Type Description	Electricity Demand (kWh/year)
Eldercare Facility	696,974
Childcare Facility	59,437
Parking with Elevator	457,080
Parking Lot	980
Total	**1,214,471**
Source: Utilities Technical Memorandum, Psomas, May 2020; Appendix I	

Table 4-8
Proposed Natural Gas Demand

Type Description	Natural Gas Demand (kBtu/year)
Eldercare Facility	1,622,180
Childcare Facility	185,723
Total	**1,807,903**
Source: Air Quality and Greenhouse Gas Emissions Modeling; Appendix D	

Table 4-9
Estimated Project Annual Transportation Energy Consumption

Source	Fuel Consumption (Gallons)	
	Gasoline	Diesel
Vehicle Trips	49,032	12,041
See Appendix D for fuel consumption calculations.		

Electricity

With compliance with Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,214,471 kWh per year (refer to Table 4-7). Based on LADWP's 2017 Resource Plan, LADWP forecasts that its total energy sales in the 2024-2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.[31] As such, the Project-related net increase in annual electricity consumption would represent only approximately 0.005 percent of LADWP's projected sales in 2024-2025. In addition, LADWP is committed to ensuring the sustainability of its power supply, and is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and at least 50 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

[31] *LADWP 2017*

Natural Gas

The Southern California Gas Company (SoCal Gas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is anticipated to generate a net increase in the on-site demand for natural gas totaling approximately 1,807,903 kBTU per year, or approximately 4,953 kBTU per day (4,953 cf per day). Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 1.9 billion cf per day in 2035.[32] The Project's natural gas consumption would account for approximately 0.0002 percent of the forecasted 2035 consumption in SoCal Gas's planning area.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Sites. As shown in Table 4-9, the Project's net demand for gasoline and diesel would be 49,032 and 12,041 gallons per year, respectively. The Project Site is located in a High Quality Transit Area (HQTA) designated by SCAG that indicates that the Project Site is an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. Extensive public bus service is provided within the Project study area, and the Westwood/UCLA Station of Metro's Purple Line Extension is anticipated to open at the intersection of Wilshire and Westwood in 2027.

The existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. Specifically, the Project characteristics listed below are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, Quantifying Greenhouse Gas Mitigation Measures, which provides emission reduction values for recommended GHG emissions reduction measures, and would reduce vehicle trips and VMT associated with the Project. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. Qualifying CAPCOA measures applicable to the Project include the following:

- **Increase Density (LUT-1)**: Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the Project Site's density by replacing its surface parking areas with a new Eldercare Facility containing 176 dwelling units and guest rooms.
- **Increase Destination Accessibility (LUT-4)**: The Project Site is located in an area that offers access to multiple nearby employment, retail, and entertainment destinations. The access to multiple destinations in proximity to the Project Site would reduce vehicle trips and VMT and would encourage walking and nonautomotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

[32] *California Gas and Electric Utilities. 2018. 2018 Gas Report. Accessible at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf*

- **Increase Transit Accessibility (LUT-5)**: As stated previously, extensive public bus and rail transit service is provided within the Project study area. The Project is located near several transit routes that would promote use of transit in lieu of vehicular travel. The Project would also provide adequate bicycle parking spaces to encourage utilization of alternative modes of transportation.

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

Construction Impacts

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents far less than the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.006 percent of gasoline usage and 0.1 percent of diesel usage within Los Angeles County, respectively.[33] As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption during the construction period.

Operational Impacts

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan,[34] LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity. As such, the Project-related net increase in annual electricity consumption of 1,214,471 kWh per year would represent approximately 0.005 percent of LADWP's projected sales in 2025. Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area (Appendix I).

Based on the 2018 California Gas Report,[35] the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 1.9 billion cf per day in 2025. The Project's natural gas consumption would account for approximately 0.0002 percent of the forecasted 2025 consumption in SoCal Gas's planning area.

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[33] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

[34] *LADWP. 2017. 2017 Final Power Strategic Long-Term Resource Plan. Accessible at: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=kt54p3wl_4&_adf.c))&&_afrLoop=274121232269383*

[35] *California Gas and Electric Utilities. 2018 California Gas Report. Accessible at: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf*

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

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.[36] Therefore, Project electricity consumption during operational activities would have a negligible effect on load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[37] Electricity and Natural Gas usage during Project operations presented in Table 4-7 and Table 4-8 would comply with Title 24 standards and applicable CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

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

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

e. Effects of the Project on Energy Resources

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[38] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years

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[36] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*
[37] *Energy Independence and Security Act of 2007, Pub.L. 110-140.*
[38] *California Gas and Electric Utilities, 2018 California Gas Report.*

of natural gas reserves based on 2015 consumption.[39] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[40] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available.[41] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.[42]

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

As discussed above, the Project would include project features to reduce vehicle miles travelled during operational activities. The Project's high density design and location to job centers and retail uses would allow for residents to live closer to services and shopping areas, reducing the vehicle miles travelled. The design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. As further discussed in Subsection 8, Greenhouse Gas Emissions, these measures would result in an approximately 25-percent reduction in GHG emissions from mobile sources, with a corresponding reduction in the Project's petroleum-based fuel usage. Therefore, the Project would encourage the use of efficient transportation alternatives.

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[39] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed January 3, 2019.*

[40] *BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html#oil-reserves, accessed January 15, 2019.*

[41] *California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/, accessed March 7, 2019.*

[42] *CEC, Wind Resource Area & Wind Resources, www.energy.ca.gov/maps/renewable/wind.html, updated October 16, 2017.*

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

The current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). In addition to compliance with the City's Green Building Code, the Project would be capable of achieving at least LEED® Silver equivalent status, which include conservation features to reduce natural gas usage. LEED® equivalent status may be achieved through a variety of measures, some of which are not directly related to energy consumption (e.g. interior lighting, acoustic performance). Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

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

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

h. Whether the Project conflicts with adopted energy conservation plans

As discussed in Subsection 8, Greenhouse Gas Emissions, the City has published its LA Green Plan/ClimateLA in 2007 as well as the Green New Deal in 2020, which outline goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the vehicle miles travelled throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Subsection 11, Land Use and Planning, SCAG's 2016-2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016-2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2016-2040 RTP/SCS. Most notably, the Project would be an infill residential development developed within a HQTA and TPA. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro and LADOT bus lines and rail lines. The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2016-2040 RTP/SCS related to locating new housing and jobs near transit. The 2016-2040

RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020, an 18 percent decrease in VMT by 2035, and a 21 percent decrease in VMT by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in VMT by 2040 (an additional 3 percent reduction in the 5 years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Subsequent to adoption of the 2016-2040 RTP/SCS, CARB adopted in 2018 a new target requiring a 19-percent decrease in VMT for the SCAG region by 2035, which will be incorporated into the 2020-2045 RTP/SCS. The 2016-2040 RTP/SCS and the recently SCAG-approved 2020-2045 RTP/SCS (which is awaiting certification by CARB) are therefore expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

Thus, consistent with the 2016-2040 RTP/SCS, the Project would result in an approximately 25-percent reduction in GHG emissions from mobile sources, and, consequently, the Project's petroleum-based fuel usage would be reduced. In addition, the Project would comply with state energy efficiency requirements, would be capable of achieving at least current LEED® Certified equivalent status, and would use electricity from LADWP, which has a current renewable energy mix of 30 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion

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

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to energy. These include Mitigation Measure EN-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Specifically, these measures include the following:

- Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including:
    - Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
    - Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
    - Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.

- Incorporate passive environmental control systems that account for the characteristics of the natural environment.
- Use high-efficiency lighting and cooking devices.
- Incorporate passive solar design.
- Use high-reflectivity building materials and multiple glazing.
- Prohibit gas-powered landscape maintenance equipment.
- Install electric vehicle charging stations.
- Reduce wood burning stoves or fireplaces.
- Provide bike lanes accessibility and parking at residential developments.

As described in the impact analysis above, the Project already incorporates multiple green building and energy efficiency measures in compliance with CALGreen and the LA Green Building Code. In addition, the Project will provide electric vehicle charging stations and infrastructure as well as bicycle parking spaces in compliance with LAMC requirements. Furthermore, as discussed in detail in Subsection 8, Greenhouse Gas Emissions, the Project would implement PDF-GHG-1 and be capable of achieving LEED Silver equivalency. Collectively, these regulatory compliance measures and project design features are equal to or more effective than MM-EN-2(b) for reducing residential energy consumption. Since the Project would comply with existing energy efficiency standards and incorporate energy reduction practices, the Project would not result in a wasteful or inefficient use of energy, and Project impacts related to energy use under Threshold 3.a would be less than significant during construction and operation.

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

Less Than Significant Impact. The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24 of the California Code of Regulations, Part 6) and the California Green Building Standards Code (24 CCR part 11). The California Energy Code provides energy conservation standards for all new and renovated commercial buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including: appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls and ceilings. The Code also emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The City of Los Angeles adopted and released the City's first ever Sustainable City pLAn, which set short term and longer term energy and conservation targets geared towards advancing the City's economy and equity. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would cut an additional 30 percent in greenhouse gas emissions above and beyond the 2015 pLAn and

ensures that the City stays within its carbon budget between now (2020) and 2050.[43] A consistency analysis is provided in Subsection 8, Greenhouse Gas Emissions, which outlines specific policies that the Project would be consistent with. To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. As further discussed in Subsection 8 and pursuant to PDF-GHG-1, the Project would be designed to achieve LEED Silver equivalency. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels. Incorporation of these design features combined with regulatory standards, would ensure that the Project does not conflict with energy and conservation measures provided by the state or City, and as such, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is SoCal Gas service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities. The Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the Project's impacts would not be cumulatively considerable; therefore, cumulative energy impacts are concluded to be less than significant.

[43] *City of Los Angeles. Green New Deal. 2020. Accessible from: http://plan.lamayor.org/background*

4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?	☐	☒	☐	☐

The following analysis is based, in part, on a site specific Geotechnical Investigation prepared by Wood Environment and Infrastructure Solutions, Inc. dated May 6, 2016 and updated April 18, 2019.[44] This report was approved by the Los Angeles Department of Building and Safety, Grading Division, by a letter dated October 8, 2020 (LADBS Approval Letter). The Geotechnical Investigation and LADBS Approval Letter are included in Appendix F of this SCEA.

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

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

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

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

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[44] *Wood Environment and Infrastructure Solutions, Inc. 2016. Report of Geotechnical Investigation – Proposed Belmont Village – Westwood (revised April 18, 2019). See Appendix F of this SCEA. The 2019 revisions to the 2016 geotechnical investigation were prepared due to changes from internal comments and due to design standard changes. The 2016 report is included as Appendix B to the 2019 revised report.*

Based on the Geotechnical Investigation, prepared for the Project and included in Appendix F of this SCEA, the Project Site is not located within an Alquist-Priolo Special Study Zone Area, Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area. According to the Geotechnical Investigation, the closest active fault is the Santa Monica Fault, located approximately 0.5 miles south of the Project Site. As such, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes and fault rupture that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault.
- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and did not identify any faults passing under the Project Site. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. As a result, impacts related to exposure to fault ruptures and exacerbating geologic hazards would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The Southern California region is susceptible to strong ground shaking from severe earthquakes. Consequently, development of the Project could expose people and structures to strong seismic ground shaking. As noted above, no active faults are known to pass directly beneath the Project Site. The closest active fault is the Santa Monica Fault, located approximately 0.5 miles south of the Project Site.

The Project would not exacerbate ground shaking potential and would be designed and constructed in accordance with state and local building codes to reduce the potential for exposure

of people or structures to seismic risks to the maximum extent possible. State and local code requirements ensure that buildings are designed and constructed in a manner that reduce the substantial risk that it would collapse, although it may sustain damage during a major earthquake. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. The Project would be required to comply with the seismic safety requirements in the International Building Code (IBC), CBC, and the LAMC. Pursuant to LAMC Section 91.7006, the Project would be required to provide a final design-level geotechnical report, subject to LADBS review and approval prior to the issuance of grading permits for the Project. The final geotechnical report would include the primary recommendations of the preliminary Geotechnical Investigation, and the final design-level recommendations from that report would be enforced by LADBS for the construction of the Project.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of strong seismic ground shaking that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards.
- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and concluded that the Project would not exacerbate ground shaking potential. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards such as ground shaking, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Accordingly, impacts related to exposure to ground shaking and exacerbating geologic hazards would be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy

soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

Although the Project Site is not located in an area designated with a potential for liquefaction, the Project's Geotechnical Investigation determined that "there is a potential for liquefaction in the medium dense silty sand, sand, and sandy silt layers beneath the site…" Furthermore, the Geotechnical Investigation concluded that the planned foundations on the Project Site could be subject to ¾ inch or less of movement/settlement. As stated in the Geotechnical Investigation, with the incorporation of the recommendations the potential for liquefaction-induced settlement is low.

The Project would be required to comply with current engineering practices as reflected in the City of Los Angeles Building Code (Chapter IX of the LAMC), the International Building Code (IBC), and the California Building Code (CBC). The IBC and CBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of adverse soil conditions. Uniform Building Code Chapter 18 Division 1 Section 1804.5 requires the submittal of a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Los Angeles Department of Building and Safety (LADBS), for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of seismic related ground failure and liquefaction that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and concluded that potential for liquefaction-induced settlement is low. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific

geotechnical recommendations for increasing safety and reducing geologic hazards such as liquefaction, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Accordingly, impacts related to exposure to ground failure/liquefaction and exacerbating geologic hazards would be less than significant.

(iv) Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. The Project Site has a gentle slope from north to south from elevation 333 feet above mean sea level (amsl) to 322 feet amsl.[45] The Project Site is not located in an area identified with seismic slope instability potential, and is not located in the path of any known or potential landslides. All required excavations are expected to be sloped or properly shored in accordance with the applicable provisions of the City of Los Angeles Building Code. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. Therefore, the Project would not directly or indirectly cause substantial adverse effects resulting from landslides.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of landslides that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.

Consistent with the above measure, a Geotechnical Investigation was prepared for the Project and concluded that potential for landslides is low. Notwithstanding, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards such as landslides, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Accordingly, impacts related to exposure to landslides and exacerbating geologic hazards would be less than significant.

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

Less Than Significant Impact. Construction of the Project would result in ground surface disturbance during site clearance and grading, which could create the potential for soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would

[45] *California Geological Survey, 2018, Earthquake Zones of Required Investigation, Beverly Hills Quadrangle, Earthquake Fault Zones Revised Official Map Released January 11, 2018 and Seismic Hazard Zones, Official Map Released March 25, 1999.*

be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. All grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion, including a requirement to prepare a Grading Plan that would conform to LADBS' Grading Division's Landform Grading Manual Guidelines, and implement appropriate erosion control and drainage devices per applicable LAMC provisions. Specifically, LAMC Section 91.7006.7 includes requirements regarding import and export of earth material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. In addition, the Project would be required to comply with additional applicable state, regional, and City policies and regulations (e.g., NPDES and SWPPP requirements as well as City LID, as described further in Subsection 10, Hydrology and Water Quality), which would further reduce the Project's potential impacts related to surface runoff and water quality.

Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and/or landscaped.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.
- Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB.
- Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and concluded that potential for erosion is low. Furthermore, the Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management. Compliance with existing City and state regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards such as soil erosion and loss of topsoil. Accordingly, impacts related to exposure to ground shaking and exacerbating geologic hazards would be less than significant.

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

Less Than Significant Impact. The Project Site is not located in a hillside area and has a gentle slope from north to south from elevation 333 feet above mean sea level (amsl) to 322 feet amsl. The Project Site is not located in an area identified to have potential for seismic slope instability or in the path of any known or potential landslides (Appendix F). No groundwater was encountered in any of the borings to the maximum depth of approximately 62 feet below the existing grade. Historic high groundwater level is about 25 feet below existing grade.

Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. This can occur as extraction of groundwater or petroleum from rocks can cause the permanent collapse of the space previously occupied by the fluid. Because excavation for the subterranean parking structure could extend up to 43 feet below grade, which is below the historic-high groundwater level on-site, minor dewatering of groundwater seepage via gravel-filled trenches is anticipated. In compliance with the Geotechnical Investigation recommendations, the Project design would take into consideration the historic-high groundwater level through procedures such as, but not limited to, designing a permanent subdrain system to remove seepage groundwater. In accordance with LAMC Section 91.7006, geotechnical recommendations would be included in the final design-level report for LADBS review and approval. All improvements placed below the historic-high groundwater level, including basement walls, would be waterproofed and designed to support hydrostatic pressure.[46] In addition, a permanent subdrain system would need to be designed for the basement or the footings (Appendix F). Therefore, groundwater withdrawal during periods of high groundwater levels would not result in substantial surface settlement at or near the Project Site.

The Project Site is not located in an oil field or oil drilling area (Appendix F).The Project Site is located 0.5 mile east and 800 feet west of the Sawtelle and Cheviot Oil Fields, respectively, and the closest known oil exploration well is located approximately 0.5 mile northwest of the Project Site. Should undocumented abandoned wells or other undocumented wells be discovered during excavations, the wells would have to be abandoned in accordance with California Division of Gas and Geothermal Resources (DOGGR) standards and regulations (Appendix F).

Because the Project involves excavation up to depths of 43 feet and space is not available to construct temporary embankments sloped back at a 1:1 inclination, shoring would be required in accordance with the recommendations made in the Geotechnical Investigation. Geotechnical recommendations will be included in final design-level report for LADBS review and approval, per LAMC Section 91.7006 requirements. With implementation of the recommended shoring approaches, no subsidence is anticipated.

A layer of fill soils, up to approximately six and a half feet thick that consist predominantly of silty sand with fine gravels is present on the Project Site. Because these fill soils are not suitable for the support of the proposed structure, pavement, and other concrete walks and slabs, the existing fill soils would be removed over the course of excavation for the subterranean parking structure. Floor slabs and conventional spread/continuous footings for the proposed Project may be supported at grade on the undisturbed natural soils.

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[46] *Hydrostatic pressure is the pressure that is exerted by a fluid at equilibrium at a given point within the fluid, due to the force of gravity.*

As discussed in Threshold 7a.III, although the Project Site is not located in an area designated with a potential for liquefaction, the Project's Geotechnical Investigation determined that "there is a potential for liquefaction in the medium dense silty sand, sand, and sandy silt layers beneath the site…" As discussed in Threshold 7a.III, compliance with City and State building codes would reduce seismic ground shaking impacts with current engineering practices and the Project would not exacerbate liquefaction potential in the area.

The Project would be required to implement standard construction practices that would ensure that the integrity of the Project Site and proposed structures are maintained. Construction would be required to comply with the International Building Code (IBC), California Building Code (CBC), and LAMC, which are designed to ensure safe construction and include building foundation requirements appropriate to Project Site conditions.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of unstable soil that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and concluded that potential for unstable soils is low. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Accordingly, impacts related to exposure to landslide, lateral spreading, subsidence, liquefaction, collapse and exacerbating geologic hazards would be less than significant.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and sell with repeated cycles of wetting and drying. Subsurface borings were advanced to a depth of 61.5 feet. Project Site soils, as depicted in the boring logs contained in the Geotechnical Investigation (Appendix F), consist of moist, medium dense to very dense silty sand, sand, and sandy silt in a very stiff to hard condition. These soils, due to their low moisture content, do not typically have high expansion potential. Due to the absence of expansive soils on the Project Site and the Project's compliance with the recommendations set forth in the

Geotechnical Investigation, as well as the conditions of the LADBS Approval Letter, the Project would not exacerbate existing conditions with regard to expansive soil. There would be no direct or indirect risks to life or property.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to geology and soils. These include Mitigation Measure GEO-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of expansive soil that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Specifically, these measures include the following:

- Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides.
- Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.

Consistent with the above measures, a Geotechnical Investigation was prepared for the Project and concluded that potential for expansive soils is low. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code, and would be required to provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project. Compliance with existing City regulatory requirements would be equal to or more effective than MM-GEO-1(b), as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing expansive soil hazards, and the proposed buildings would be constructed in accordance with all City required geotechnical requirements. Accordingly, impacts related to exposure to expansive soils would be less than significant.

e) Would the project 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 wastewater?

No Impact. The Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative wastewater disposal systems.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to result in impacts pertaining to septic tanks or alternative wastewater disposal systems. Therefore, no mitigation measures are applicable. Furthermore, no impact related to the use of septic tanks or alternative wastewater disposal systems would occur.

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

Less than Significant with Mitigation Incorporated.

Geologic Features

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

Paleontological Resources

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

The Project Site is in an urbanized area and has been previously disturbed in conjunction with the existing improvements on the Project Site. The likelihood that intact paleontological resources is low. Because the Project Site has been developed previously, any surficial paleontological resources that may have been present at one time have likely been disturbed. Furthermore, the Geotechnical Investigation determined that fill soils up to about six and a half feet thick are present over most of the Project Site. Therefore, the topmost layers of soil in the Project area are not likely to contain substantive fossils. The Project would require excavation to previously undisturbed depths up to 43 feet below the surface for the construction of multiple underground parking levels. This could uncover potentially previously undetected paleontological resources. Therefore, the possibility for such resources exists, and impacts would be potentially significant if resources were directly or indirectly damaged.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to cultural resources, including paleontological resources. These include Mitigation Measure CUL-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. All but one of the identified measures are to be applied to development sites with a moderate to high potential to yield unique paleontological resources, and would therefore not be relevant to the Project Site. However, the remaining following measure may be applicable:

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

Consistent with the above measure, and to address the potential for encountering previously unidentified paleontological resources during ground-disturbing activities, MM-GEO-1 has been

prepared, which provides a process for avoiding and, as necessary, evaluating impacts to any identified resources. MM-GEO-1 is equal to or more effective than relevant measures under Mitigation Measures CUL-1(b), as it provides site-specific procedures to follow during Project construction activities and to guide responses in case of unanticipated discovery of a paleontological resource. With its incorporation, potential impacts to paleontological resources will be less than significant.

Mitigation Measure

MM-GEO-1 **Paleontological Resources.** A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be determined by the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The related projects, similar to the proposed Project, are located within a highly urbanized area that has been extensively disturbed and developed. Impacts associated with geology and soils are generally site-specific and would be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, and would also be required to implement necessary mitigation to address potential discovery of paleontological resources. Therefore, no significant cumulative impacts to geology or soils would occur.

4.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The following analysis is based, in part, on the Air Quality and Greenhouse Gas Report (AQ/GHG Report), dated June 2020 and included in Appendix D of this SCEA.

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater chance) that the global average net effect of human activities has been the dominant cause of warming since the mid-20th century (IPCC 2014).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (United States Environmental Protection

Agency [U.S. EPA] 2018). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane CH_4 has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC 2007).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C cooler (CalEPA 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Regional/Local Regulations

SCAG 2016-2040 RTP/SCS

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation, where by law, SCAG is required to ensure that transportation activities are supportive of and comply with the goals of regional and state air quality plans in order to attain the NAAQS. In addition, SCAG co-produces the transportation strategy and transportation control measure sections of the AQMP with the SCAQMD for the South Coast Air Basin. With regard to air quality planning, SCAG adopted the 2016-2040 RTP/SCS in April 2016, which addresses regional development and growth forecasts and forms the basis for the land use and transportation control portions of the AQMP. The growth forecasts are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP/SCS and AQMP are based on projections originating within local jurisdictions.

SCAG's Sustainable Communities Strategy provides specific implementation strategies. These strategies include supporting Projects that encourage a diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

On September 3, 2020, SCAG's Regional Council approved and adopted the Connect SoCal plan (2020-2045 RTP/SCS). Similar to the 2016-2040 RTP/SCS, the 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles (including the 2016-2040 RTP/SCS) to increase mobility options and achieve a more sustainable growth pattern, while achieving CARB's GHG reduction targets. CARB has not yet certified the 2020-2045 RTP/SCS; accordingly, this SCEA primarily assesses the Project in relation to the 2016-2040 RTP/SCS. Notwithstanding, as described in

Section 3 of this SCEA, the Project would be consistent with the goals and policies contained in both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS.

Green LA/Climate LA Plans

The City of Los Angeles adopted *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA), in May 2007. Green LA set the goal of reducing the City's greenhouse gas emissions to 35 percent below 1990 levels by 2030. The emphasis of Green LA is on municipal facilities and operations followed by programs to reduce emissions in the community. To facilitate implementation of Green LA, the City adopted the Los Angeles Green Building Code, as discussed below. In addition, the Los Angeles Department of Water and Power will continue to implement programs to emphasize water conservation and will also pursue securing alternative water supplies, including recycled water and storm water capture. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. Under the RENEW LA plan, the City is also developing facilities that will convert solid waste to energy without incineration. These measures would serve to reduce overall emissions from the City. Green LA is being implemented through Climate LA, which provides detailed information about each action item discussed in the Green LA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

City of Los Angeles Sustainable City pLAn and Green New Deal

On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to greenhouse gas reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing "blue, green, and black" waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAn, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between 2020 and 2050.

City of Los Angeles Green Building Code

On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the LAMC, by adding a new Article 9 to incorporate various provisions of the 2010 CALGreen Code. On December 27, 2019, Ordinance No. 186,488 became effective, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2019 CALGreen Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. California's building codes are published in their entirety every three years, and the City implements corresponding amendments to its Green Building Code accordingly.

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

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

Less Than Significant Impact. CEQA Guidelines Section 15064.4 recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of project-related GHG emissions, including: the extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)).

As discussed in detailed in the AQ/GHG Technical Report included as Appendix D, the City has not adopted a quantitative significance threshold for assessing impacts related to GHG emissions and has not formally adopted a climate action plan for reducing GHG emissions. Neither SCAQMD, OPR, CARB, the California Air Pollution Control Officers Association (CAPCOA), nor any other state or regional agency has adopted a quantitative significance threshold for assessing GHG emissions that applies to the Project. Since there is no applicable adopted or accepted quantitative threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. Accordingly, a consistency analysis has been prepared and included below, which describes the Project's consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions. Although consistency is based on the qualitative consistency analysis, a quantification of emissions has been provided in accordance with CEQA Guidelines 15064.4(a). As discussed in detail in Appendix D, the Project would not generate greenhouse gas emissions that would result in a significant impact on the environment. In addition, the Project would implement the following Project Design Feature, included below, which would further reduce greenhouse gas emissions.

Project Design Feature

GHG-PDF-1 **LEED Silver Equivalency.** The design of the new buildings shall incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED® Silver or equivalent green building standards. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification shall include, but are not limited to the following:

- Use of Energy Star–labeled products and appliances.
- Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.

- Water-efficient plantings with drought-tolerant species;
- Fenestration (the arrangement of windows, doors, and other openings) designed for solar orientation; and
- Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

Consistency with Applicable Plans and Policies

As discussed in detail in the AQ/GHG Report (Appendix D), the City has not adopted a quantitative significance threshold for assessing impacts related to GHG emissions and has not formally adopted a climate action plan for reducing GHG emissions. Furthermore, neither SCAQMD, OPR, CARB, the California Air Pollution Control Officers Association (CAPCOA), nor any other state or regional agency has adopted a quantitative significance threshold for assessing GHG emissions that applies to the Project. Since there is no applicable adopted or accepted quantitative threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. These plans include the applicable portions of the AB 32 Climate Change Scoping Plan, the 2017 Scoping Plan, the 2016–2040 RTP/SCS, and the mayoral initiative Sustainable City pLAn/Green New Deal. 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. Accordingly, a consistency analysis has been prepared, which describes the Project's consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions.

2008 Climate Change Scoping Plan and 2017 Climate Change Scoping Plan

In 2006, AB 32 codified the State's target of reducing GHG emissions to 1990 levels by 2020 (EO S-3-05). To achieve this target, CARB published the 2008 Climate Change Scoping Plan as required by AB 32, which was updated in 2014 to reflect changing strategies. In 2016, SB 32 codified the State's target of reducing GHG emissions by 40 percent below 1990 levels, and CARB published the 2017 Climate Change Scoping Plan to demonstrate a pathway toward achieving this target. Table 4-10 summarizes the project's consistency with applicable strategies contained in the 2008 Climate Change Scoping Plan and 2013 Scoping Plan Update as well as the 2017 Climate Change Scoping Plan. As discussed in Table 4-10, the Project would be consistent with applicable actions and strategies of the 2008 Climate Change Scoping Plan and First Update as well as the 2017 Climate Change Scoping Plan.

Table 4-10
Consistency with Climate Change Scoping Plans

Measure	Responsible Party(ies)	Project Consistency Analysis
California Code of Regulations (CCR), Title 20: The 2016 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State and CEC	**No Conflict.** The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The project would include new Energy Star appliances in residential units and lighting that comply with this energy efficiency standard.
CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the	State and CEC	**No Conflict.** Consistent with regulatory requirements, the Project must comply with applicable provisions of the (or no less than)

Measure	Responsible Party(ies)	Project Consistency Analysis
California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.		2020 Los Angeles Green Building Code, which in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2019 Title 24 standards are 7 percent more efficient (for electricity) than residential construction built to the 2016 Title 24 standards and 30 percent more efficient (for electricity) for non-residential construction built to 2016 Title 24 standards. The 2019 Title 24 standards are more efficient than the 2020 projected Emissions under Business-as-Usual in CARB's *Climate Action Scoping Plan*. The standards promote the use of more efficiency windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project would incorporate energy efficiency standards that are substantially more effective than the measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.	State/ Manufacturers	**No Conflict.** The project would meet the requirements under AB 1109 because it would incorporate energy-efficient lighting and electricity consumption that complies with local and state green building programs.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	State, CARB, SCAG	**No Conflict.** SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The project represents an infill development in an existing urbanized area that would increase residential development in a High Quality Transit Area (HQTA). Therefore, the project would be consistent with SCAG's 2016–2040 RTP/SCS.
By 2019, adjust performance measures used to select and design transportation facilities. Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**No Conflict.** The Project would not involve construction of transportation facilities. However, the Project would be located in a High Quality Transit Area (HQTA), which would encourage use of mass transit.
By 2019, develop pricing policies to support low-GHG transportation (e.g. low- emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	**No Conflict.** In accordance with LAMC Sections 99.04.106.4.2 and 99.04.106.4.4, the Project would equip 10 percent of on-site parking spaces with electric vehicle charging stations and 30 percent of parking spaces

Measure	Responsible Party(ies)	Project Consistency Analysis
		with electric vehicle supply equipment (EVSE).
Implement California Sustainable Freight Action Plan: ▪ Improve freight system efficiency. ▪ Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CARB	**No Conflict.** The Project land uses would not include freight transportation or warehousing. Therefore, the project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	**No Conflict.** Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2019 California Plumbing Code, 2016 CALGreen, 2020 Los Angeles Plumbing Code, and 2020 Los Angeles Green Building Code. The project would include low-flow toilets, urinals, bathroom faucets, and shower heads as well as Energy Star appliances, native and/or drought-tolerant plants, and water-efficient irrigation systems. The project would be required to demonstrate an overall water use reduction of 20 percent to meet the requirements of the CALGreen.
CARB In-Use Off-Road Regulation: CARB's in-use off- road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	**No Conflict**. As required, the project applicant would use construction contractors that would comply with this regulation.
CARB In-Use On-Road Regulation: CARB's in-use on- road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.	CARB	**No Conflict**. As required, the project applicant would use construction contractors that would comply with this regulation.
Implement the Short-Lived Climate Pollutant Strategy by 2030: ▪ 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. ▪ 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, local air districts	**No Conflict.** Senate Bill 605 (SB 605), adopted in 2014, directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383, adopted in 2016, requires CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels. The Project would comply with the CARB SLCP Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, local air districts	**No Conflict.** This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a

Measure	Responsible Party(ies)	Project Consistency Analysis
		50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and a 75-percent reduction by 2025. In January 2019, CalRecycle began the formal rulemaking process for the Proposed Organic Waste Reduction Regulations to implement the organic waste landfill reduction requirements of SB 1383.
Source: 2008 Climate Change Scoping Plan and 2017 Climate Change Scoping Plan		

2016-2040 RTP/SCS

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[47] The 2016-2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. These foundational policies, which guided the development of the 2016-2040 RTP/SCS's strategies for land use, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;[48]
- Develop "Complete Communities";
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2016-2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016-2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016-2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016–2040 RTP/SCS is expected to help California reach its GHG reduction goals by reducing transportation-related GHG emissions by 8 percent by 2020, 18 percent by 2035, and

[47] *SCAG, Final 2016–2040 RTP/SCS.*

[48] *Complete language: "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pp. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

21 percent by 2040. In March 2018, CARB adopted updated targets requiring a 19-percent decrease in VMT for the SCAG region by 2035. The CARB targets were adopted after publication of the 2016-2040 RTP/SCS; as a result, the updated targets have been incorporated into the 2020-2045 RTP/SCS. The 2016-2040 RTP/SCS and/or the 2020-2045 RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

On September 3, 2020, SCAG's Regional Council approved and adopted the Connect SoCal plan (2020–2045 RTP/SCS) which, similar to the 2016-2040 RTP/SCS, sets forth goals, policies, and programs intended to reduce greenhouse gas emissions, improve active transportation, and promote development near existing transportation networks. CARB has not yet certified the 2020-2045 RTP/SCS; accordingly, this SCEA primarily assesses the Project in relation to the 2016-2040 RTP/SCS, with supplemental references to and assessment of the 2020-2045 RTP/SCS, as applicable.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS outline 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 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The Project represents an infill development within an existing urbanized area that would concentrate new residential and institutional retail uses within an HQTA, which is defined by both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS as a generally walkable transit village or corridor that is within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. As previously discussed, the Project Site is located approximately 900 feet from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA Station of Metro's Purple Line Extension which is currently scheduled to open in 2027. The Project would also include a minimum of 70 bicycle parking spaces (27 short-term and 43 long-term), and would encourage pedestrian activity by locating new residential and institutional uses on the Project Site within walking distance of existing office, institutional, entertainment, and neighborhood-serving commercial uses in the area. In addition, the Project would include electric vehicle infrastructure. As discussed in Subsection 17, Transportation, the Project is projected to have Household VMT per Capita of 6.0 and Work VMT per Employee of 2.9 (Appendix K-3 and K-4). which would not exceed the LADOT thresholds for Household VMT (7.4) and Work VMT (11.1). For Los Angeles County, the 2012 Base Year projected daily total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. The Project would result in fewer VMT than the LADOT and Los Angeles County projections. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2016–2040 RTP/SCS, with regard to individual development projects such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. This RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet

conversion to electric or other near zero-emission technologies. In accordance with LAMC Sections 99.04.106.4.2 and 99.04.106.4.4, the Project would equip 10 percent of on-site parking spaces with electric vehicle charging stations and 30 percent of parking spaces with EVSE.

Energy Efficiency Strategies and Policies

The third important focus within the 2016–2040 RTP/SCS, for individual developments such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016–2040 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed above, GHG-PDF-1 would require the design of the building to incorporate a number of sustainability features consistent with the Project's certification under AB 900, including optimizing energy performance and reduce building energy. Accordingly, the Project would be consistent with the 2016–2040 RTP/SCS energy efficiency strategies and policies.

Land Use Assumptions

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2016–2040 RTP/SCS, this SCEA also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2016–2040 RTP/SCS is analyzed in Subsection 11, Land Use and Planning. As discussed therein, the Project would be consistent with the goals and principles set forth in the 2016–2040 RTP/SCS.[49]

In sum, the Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements.

Overall, the Project would not conflict with the GHG reduction-related actions and strategies contained in the 2016-2040 RTP/SCS. As such, impacts related to consistency with the 2016-2040 RTP/SCS would be less than significant.

Sustainable City pLAn/Green New Deal

The Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development,

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[49] *Note that Goals of the 2020-2045 RTP/SCS, "Enhance the preservation, security, and resilience of the regional transportation system, Improve mobility, accessibility, reliability, and travel safety for all people and goods, Increase person and goods movement and travel choices within the transportation system, Reduce greenhouse gas emissions and improve air quality, Support healthy and equitable communities" are functionally equivalent to the goals of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same for both plans. See Section 3.0 SCEA Criteria.*

mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals.[50]

The Sustainable City pLAn/L.A.'s Green New Deal provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to housing and development as well as mobility and transit, including the reduction of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. The Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s. Green New Deal which has established targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.

Table 4-11 summarize the project's consistency with Sustainable City pLAn/Green New Deal. Although the Sustainable City pLAn/L.A.'s Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development consisting of residential and institutional uses within an HQTA, include bicycle spaces to promote alternative active transportation modes, encourage pedestrian activity by locating new residential and institutional uses on the Project Site within walking distance of existing office, institutional, entertainment, and neighborhood-serving commercial uses in the area, and result in fewer VMT than the LADOT and Los Angeles County projections.

Table 4-11
Project Consistency with Applicable
Sustainable City pLAn/Green New Deal Measures

Action	Project Consistency
Local Water	
▪ Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050	**No Conflict.** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be required to comply with the City's water use restrictions on timing, area, frequency, and duration of specified allowable water usage. The Project would also be required to comply with the Title 24 standards for Water Efficiency and Conservation that are in effect at the time of development. These standards include actions such as separate water submeters for subsystems, prescriptive reduced flow rates for water and fixtures, wall-mounted urinals, and plumbing fixtures and fittings.
Clean and Healthy Buildings	
▪ All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050. ▪ Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	**No Conflict.** The Project would be designed and operated to meet the applicable requirements of CALGreen and the City's Green Building Code.
Mobility & Public Transit	
▪ Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or	**No Conflict.** The Project is an infill development that is located in an HQTA. Specifically, the proposed Project would involve construction of an Eldercare Facility and

[50] *Sustainable City pLAn LA/Green Green New Deal. 2020, Web Accessible: https://plan.lamayor.org/where-we-are-leading/leading_plan.html*

Action	Project Consistency
transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050. ▪ Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.	Childcare Facility in an urbanized area that is well-served by public transit. The Eldercare Facility would include high-density senior residential uses and is located in close proximity to existing residential and commercial development as well as major transportation arteries. Existing public transit facilities are located within 500 feet of the Project Site, including the Wilshire/Glendon stop for Metro Local 20, Commuter Express 534, and Commuter Express 573. In addition, the Wilshire/Westwood stop for Metro Rapid 720 is approximately 800 feet away. Furthermore, the Wilshire/Westwood intersection will soon be served by the Westwood/UCLA Station of Metro's Purple Line Extension, which is currently under construction. The Project would also be directly adjacent to existing commercial and recreational development, including banks, theaters, a church, and other retail uses. Implementation of the proposed Project would place future residents in proximity to these businesses as well as facilitate use of active transportation to these uses. The Project would also include 27 short-term and 43 long-term bicycle parking spaces. Therefore, the Project would facilitate use of walking, biking, and transit as transportation modes.
Zero Emissions Vehicles	
▪ Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.	**No Conflict.** In accordance with LAMC Sections 99.04.106.4.2 and 99.04.106.4.4, the Project would equip 10 percent of on-site parking spaces with electric vehicle charging stations and 30 percent of parking spaces with EVSE.
Waste and Resource Recovery	
▪ Increase landfill diversion rate to 90% by 2025; 95% by 2035; and 100% by 2050 ▪ Reduce municipal solid waste generation per capita by at least 15% by 2030, including phasing out single-use plastics by 2028 ▪ Eliminate organic waste going to landfill by 2028 Increase proportion of waste products and recyclables productively reused and/or repurposed within Los Angeles County to at least 25% by 2025; and 50% by 2035.	**No Conflict.** The City of Los Angeles has achieved a landfill diversion rate of 76.4 percent. The Project would be subject to the requirements of the statewide commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and state programs would achieve consistency with this measure.
Source: City of Los Angeles 2020	

As discussed, the Project is consistent with the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2008 Climate Change Scoping Plan and 2014 Scoping Plan Update, the 2017 Climate Change Scoping Plan, both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS. Although the Sustainable City pLAn/L.A.'s Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development consisting of residential and institutional uses within an HQTA, include bicycle spaces to promote alternative active transportation modes, encourage pedestrian activity by locating new residential and institutional uses on the Project Site within walking distance of existing office, institutional, entertainment, and neighborhood-serving commercial uses in the area, and result in fewer VMT than the LADOT and Los Angeles County projections.

Consistency with the above plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHG emissions. Furthermore, because the Project would not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described below would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Project Emissions

As discussed above, CEQA Guidelines Section 15064.4 recommends quantification of a Project's GHG emissions. However, in the absence of an adopted numerical threshold, the quantification is being done for informational purposes only. The Project would result in direct and indirect GHG emissions generated by different types of emission sources, including:

- Construction: emissions associated with demolition of the existing buildings and surface parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscaping equipment and consumer products;
- Energy source (building operations): emissions associated with space heating and cooling, water heating, energy consumption, and lighting;
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Stationary source: emissions associated with stationary equipment, such as emergency generators during operation or equipment during construction;
- Solid waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction Emissions

For the purpose of this analysis, it is assumed that construction activity would occur over a period of approximately 35 months.[51] Construction assumptions used in the analysis of GHG emissions conservatively assume that the Project would be constructed in the shortest duration possible with the most intensive activities occurring on a daily basis. GHG emissions associated with Project construction were calculated for each year of construction activity. As shown in Table 4-12, Project construction would generate an estimated 4,381 metric tons CO_2e ($MTCO_2e$).

[51] *Post-constructions/pre-operation activities associated with system testing, system commissioning/punchlist, final inspections, and certificate of occupancy for both phases of construction would primarily be completed within the enclosed building using small hand tools, and would not involve the use of construction equipment which generate greenhouse gas emissions. Therefore, the construction GHG modeling does not include these activities. Although the construction schedule in the project description is listed as 41 months, which is longer than the 35 months assumed in the modeling, the same overall intensity of emission-producing construction activities has been analyzed, such that a longer schedule would result in the same total greenhouse gas emissions.*

Following the SCAQMD's recommended methodology for amortizing construction emissions over a 30-year period (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions), construction of the Project would generate an estimated 146 $MTCO_2e$ per year.

Table 4-12
Estimated Construction Emissions of Greenhouse Gases

Construction Year	Annual Emissions (MT of CO_2e)
2021	454.7
2022	1,049.5
2023	1,502.0
2024	1,375.0
Total	4,381.2
Amortized over 30 years	**146.0**

Note: Some numbers may not add up due to rounding.
Source: Air Quality and Greenhouse Gas Report. (See Appendix D).

Operational Emissions

Table 4-13 Illustrates the associated operational annual emissions of greenhouse gases. As shown in Table 4-13, the Project would result in 1,716.9 MTCO2e, without subtracting existing operational uses. The net change in operational emissions would be approximately 1,444.7 $MTCO_2e$.

Table 4-13
Estimated Operational Emissions of Greenhouse Gases

Emission Source	Existing Use Emissions (MT of CO_2e)	Proposed Project Emissions (MT of CO_2e)	Net Change in Emissions (Proposed Project – Existing Uses) (MT of CO_2e)
Operational			
Area	0.3	45.6	45.3
Energy[1]	33.9	510.0	476.1
Solid Waste	6.3	65.3	59.0
Water[1]	7.0	80.6	73.6
Mobile			
CO_2 and CH_4	220.5	1,005.0	784.5
N_2O	4.2	10.4	6.2
Total	**272.2**	**1,716.9**	**1,444.7**

Note: Some numbers may not add up due to rounding.
[1] Electricity emissions were adjusted to account for reductions in the carbon intensity of electricity generation due to implementation of the State RPS Program, which requires 33 percent renewable energy by 2020 and 44 percent by 2024 (see Appendix D for calculations). Emissions from electricity generation only take into account carbon intensity at build out year, but does not take into account decreasing carbon intensity required by SB 100 (RPS). However, it is recognized that the RPS would require utilities to supply 60 percent renewable energy by 2030.

N/A = not applicable
Source: Air Quality and Greenhouse Gas Report (See Appendix D).

Combined Construction and Operational Emissions

Table 4-14 combines the construction, operational, and mobile GHG emissions associated with existing uses and development of the Project. The net increase in annual GHG emissions associated with the proposed eldercare facility and expanded church preschool would total approximately 1,591 $MTCO_2e$, after accounting for removal/replacement of the existing uses at the Project Site.

Table 4-14
Combined Annual Emissions of Greenhouse Gases

Emission Source	Existing Use Emissions (MT of CO_2e)	Proposed Project Emissions (MT of CO_2e)	Net Change in Emissions (Proposed Project – Existing Uses) (MT of CO_2e)
Construction	N/A	146.0	146.0
Operational			
Area	0.3	45.6	45.3
Energy[1]	33.9	510.0	476.1
Solid Waste	6.3	65.3	59.0
Water[1]	7.0	80.6	73.6
Mobile			
CO_2 and CH_4	220.5	1,005.0	784.5
N_2O	4.2	10.4	6.2
Total	**272.2**	**1,862.9**	**1,590.7**

Note: Some numbers may not add up due to rounding.
[1] Electricity emissions were adjusted to account for reductions in the carbon intensity of electricity generation due to implementation of the State RPS Program, which requires 33 percent renewable energy by 2020 and 44 percent by 2024 (see Appendix D for calculations). Emissions from electricity generation only take into account carbon intensity at build out year, but does not take into account decreasing carbon intensity required by SB 100 (RPS). However, it is recognized that the RPS would require utilities to supply 60 percent renewable energy by 2030.
N/A = not applicable
Source: Air Quality and Greenhouse Gas Report (See Appendix D).

Post-2030 Analysis

Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050 as additional appropriate reduction measures are adopted. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of

policies could allow the statewide emissions level to remain very low through 2050 (Appendix D).[52]

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. As shown in Table 4-10, the 2017 Scoping Plan adopted in response to SB 32 involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cards on the road, improving energy efficiency, and curbing emissions from key industries. The Project's design features advance these goals by reducing VMT, facilitating the use of electric vehicles, improving energy efficiency, and reducing water usage.

Furthermore, the Project's consistency with the SCAG 2016-2040 RTP/SCS demonstrates that the Project would be consistent with post-2020 GHG reduction goals. The 2016-2040 RTP/SCS would result in an estimated eight percent decrease in per capita GHG emissions from passenger vehicles by 2020, an 18 percent decrease in per capita GHG emissions from passenger vehicles by 2035, and a 21 percent decrease in per capita GHG emissions from passenger vehicles by 2040 (SCAG 2016). In March 2018, CARB adopted updated targets requiring a 19 percent decrease in VMT of the SCAG region by 2035. Given that the CARB targets were adopted after the 2016-2040 RTP/SCS, they have been incorporated into the 2020-2045 RTP/SCS. The 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS, which is awaiting CARB certification, are expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

The Project is the type of land use development sited in an HQTA that is encouraged by the 2016-2040 RTP/SCS to reduce VMT and expand use of multi-modal transportation options. As discussed in Subsection 17, Transportation, the Project is projected to have Household VMT per Capita of 6.0 and Work VMT per Employee of 2.9 (Appendix K-3 and K-4). which would not exceed the LADOT thresholds for Household VMT (7.4) and Work VMT (11.1). For Los Angeles County, the 2012 Base Year projected daily total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. The Project would result in fewer VMT than the LADOT and Los Angeles County projections. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS. As discussed in Subsection 6, the Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. Specifically, the Project characteristics listed below are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, Quantifying Greenhouse Gas Mitigation Measures, which provides emission reduction values for recommended GHG emissions reduction measures, and would reduce vehicle trips and VMT associated with the Project. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. Qualifying CAPCOA measures applicable to the Project include the following:

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[52] *CARB developed scenarios to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the State's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, Energy and Environmental Economics (E3) modeled these scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors (CARB 2017, Appendix D).*

- **Increase Density (LUT-1)**: Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the Project Site's density by replacing its surface parking areas with a new Eldercare Facility containing 176 dwelling units and guest rooms.
- **Increase Destination Accessibility (LUT-4)**: The Project Site is located in an area that offers access to multiple nearby employment, retail, and entertainment destinations. The access to multiple destinations in proximity to the Project Site would reduce vehicle trips and VMT and would encourage walking and nonautomotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- **Increase Transit Accessibility (LUT-5)**: As stated previously, extensive public bus and rail transit service is provided within the Project study area. The Project is located near several transit routes that would promote use of transit in lieu of vehicular travel. The Project would also provide adequate bicycle parking spaces to encourage utilization of alternative modes of transportation.

By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets beyond 2030.

The emissions modeling in the 2017 Scoping Plan projected 2030 statewide emissions, which take into account known commitments at the time such as SB 375, SB 350, and other measures discussed above. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments at the time do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Scoping Plan assumed a scenario in which the Cap-and-Trade Program would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2017 Scoping Plan, additional measures to achieve the 2030 target and beyond are outside of the City or the Project's control. Therefore, any evaluation of post-2030 Project emissions would be speculative.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding an individual project's potential to result in GHG impacts. Therefore, no prior mitigation measures would be applicable.

Cumulative Impacts

Less Than Significant Impact. The analysis of a project's GHG emissions is inherently a cumulative analysis because climate change is a global issue and the emissions from individual projects are negligible in a global context. Accordingly, the analysis above takes into account the potential for the Project to contribute to a cumulative impact of global climate change. The discussion above under Threshold 8.a and 8.b illustrate that implementation of the Project's regulatory requirements and project design features, including state mandates, would contribute to GHG reductions. These reductions support state goals for GHG emissions reductions.

As discussed above, the Project would be consistent with all applicable plans (2008 Climate Change Scoping Plan and 2017 Climate Change Scoping Plan, Sustainable City pLAn/Green New Deal, SCAG RTP/SCS, etc.) related to the reduction of greenhouse gas emissions. Consistency with these plans, policies, regulations and GHG reduction actions/strategies would reduce the Project's incremental contribution of GHG emissions and would not prevent the State and other agencies from reaching their GHG reduction goals.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases. These include Mitigation Measure GHG-3(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. These measures include the following:

- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions.
- Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.
- Land use siting and design measures that reduce GHG emissions.

Consistent with the above measures, the Project is a mixed-use infill development project within a HQTA and TPA, and located in close proximity to multiple major transit stops. The Project will also provide bicycle parking pursuant to LAMC requirements, and will facilitate pedestrian travel to and from the Project by providing streetscape enhancements as well as a courtyard area along Wilshire Boulevard. In addition, the Project will comply with State and City measures regarding recycling of construction waste, use of water efficient fixtures and energy efficient lighting, and will achieve LEED Silver equivalency pursuant to PDF-GHG-1. Furthermore, as described in the impact analysis above, the Project does not have the potential to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emission of GHGs. Therefore, due to this lack of conflict with applicable plans and the incorporation of measures that are consistent with Mitigation Measure GHG-3(b), the Project's contribution to cumulative GHG impacts will be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
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?	☐	☐	☐	☒

The following analysis is based, in part on the Phase I Environmental Site Assessment (Phase I ESA), prepared by SKA Consulting, dated April 12, 2016. This report is included as Appendix G of this SCEA.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction Impacts

The proposed Project would involve the construction of an Eldercare Facility and Childcare Facility. Construction of the Project would involve routine handling of small quantities of hazardous or potentially hazardous materials, such as gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles. This handling of hazardous materials would be a temporary activity and coincide with the short-term construction phase of the Project. The transport, use, and storage of hazardous materials during the construction and operation of the Project would be conducted in accordance with applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Through compliance with these regulatory requirements, no significant hazards to the public or environment would result in connection with the construction of the Project.

Operational Impacts

Operation of the Project as an Eldercare Facility and Childcare Facility would not involve the routine transport, use or disposal of hazardous substances other than minor amounts typically used for maintenance and landscaping. For operation of the Eldercare Facility, some medicines and medical supplies would be used on-site, but of limited type and quantity, and to be administered by registered nurses. The State Medical Waste Management Act (MWMA) (22 CCR Sections 65600–65628) provides for regulation of medical waste generators, haulers, and treatment facilities. The MWMA defines medical waste as all of the following:

- Biohazardous waste, or “sharps” waste;
- Waste that is generated or produced as a result of the diagnosis, treatment, or immunization of human beings or animals, in related research, in the production or testing of biologicals, or in the accumulation of properly contained home-generated “sharps” waste;
- Trauma scene waste contaminated with human blood or other fluids, produced by an accident or illness.

The MWMA recognizes two separate types of generators: Small Quantity Generators (less than 200 pounds per month) and Large Quantity Generators (more than 200 pounds per month). Small Quantity Generators that treat their waste on-site and Large Quantity Generators must complete a Medical Waste Management Plan and register it with the local enforcement agency (the California Medical Waste Management Program). In accordance with the Health and Safety Code, Section 118029, the Project Applicant would be required to dispose of medical waste through an authorized medical waste transporter. To determine the exact quantity of medical waste that would be generated on-site would be speculative; however, the Project would be required to comply with the MWMA to ensure proper handling and disposal of medical wastes.

For the residential units in the Eldercare Facility, minor general household hazardous waste (HHW) generation would be expected. HHW includes used batteries, electronic waste, and other waste prohibited or discouraged from being disposed of at local landfills. Use of common

household hazardous materials and their disposal do not present a substantial health risk to the community. Regular operation and maintenance of residential units would not involve the use, storage, transport, or disposal of hazardous wastes and substances.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to the routine transport, use, or disposal of hazardous materials. These include Mitigation Measure HAZ-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. These measures include the following:

- Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable.
- Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.
- Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.
- Avoid overtopping construction equipment fuel gas tanks.
- During routine maintenance of construction equipment, properly contain and remove grease and oils.
- Properly dispose of discarded containers of fuels and other chemicals.

As discussed above, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. Therefore, no mitigation is required. Regardless, consistent with these SCAG measures, the Project Applicant would implement appropriate hazardous materials management protocols at the Project Site to the extent applicable during construction and operation, and would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Through compliance with these applicable regulatory requirements, which are consistent with the above-identified measures under Mitigation Measure MM-HAZ-1(b), the Project's impacts would be less than significant.

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

Less Than Significant Impact. The Project Site has not historically been used for an industrial purpose, or as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, waste treatment facility or recycling facility.[53] No chemical use is present on-site and there are no known spills or releases, known environmental cleanups, or obvious indicators of environmental contamination (Appendix G). The Project is an infill development consisting of an Eldercare Facility and Childcare Facility. These types of uses

[53] *SKA Consulting. 2016. Phase I Environmental Site Assessment. (Included as Appendix G of this SCEA).*

would be expected to use and store small amounts of hazardous materials, such as medicines, medical supplies, paints, solvents, cleaners, and pesticides, during construction and operation. These quantities would not be sufficient to cause a potential hazard. All hazardous materials in the Project Site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, state, and local requirements. As discussed above under Threshold 9.a, all hazardous materials generated by the Eldercare and Childcare Facilities would comply with state and local regulations, particularly the MWMA. With compliance to applicable requirements, the Project would result in a less than significant impact in regard to the creation of any health hazard or potential health hazard.

As reported in the Phase I ESAs for the Project Site, the existing buildings on the Project Site have the potential to contain asbestos containing materials (ACM) due to their age and because limited ACM abatement was reportedly performed in 2012 as part of renovations to the Sanctuary (Appendix G). In addition, due to the age of the structures, there is potential that lead based paint may be present in on-site structures. If present, demolition of these structures to accommodate the proposed project could disturb ACM or lead based paint and, if uncontrolled, create health or safety impacts for construction workers or neighboring residences. Incorporation of PDF's HAZ-1 and HAZ-2 include the preparation of ACM and lead based paint surveys to investigate the potential presence of these materials, and if found to be present, abatement in accordance with all applicable State and Federal regulations by a qualified and licensed contractor.

The Project Site is also located in a methane buffer zone and thus, prior to the issuance of a building permit, the Project Site would be required to be independently analyzed by a qualified engineer, as defined in City Ordinance No. 175,790 and Section 91.7102 of the LAMC. The engineer would investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Project Site Design level which would prevent or retard potential methane gas seepage into the building. The engineer's design recommendation would be subject to LADBS, and Los Angeles Fire Department (LAFD) review and approval. During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures would be implemented as required to preclude any exposure of workers to unsafe levels of soil gases, including, but not limited to, methane. Compliance with applicable laws and regulations during construction of the Project would address the aforementioned hazards and reduce the impact associated with the potential release of hazardous materials to less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to the release of hazardous materials. These include Mitigation Measure HAZ-4(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to a project located on a hazardous materials site. While the Phase I ESA confirms that the Project Site is not identified as a hazardous materials site, potentially relevant measures of HAZ-4(b) include the following:

- Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.
- If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8;

Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations.

- Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.
- Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.

Consistent with these measures, a Phase I ESA was prepared, and confirmed that the Project Site is not identified as a hazardous materials site. The Phase I ESA recommended that an asbestos survey be performed prior to any renovation or demolition activities. In addition, given the age of some of the Project Site buildings, lead-based paint may be present. Accordingly, and consistent with Mitigation Measure HAZ-4(b), Project Design Features PDF-HAZ-1 and PDF-HAZ-2 will be implemented as part of the Project which would ensure that potential lead based paint and asbestos containing materials are identified and abated appropriately under applicable state and local regulations prior to demolition of any structures. These PDFs as well as the Project's required regulatory compliance will be equal to or more effective than Mitigation Measure HAZ-4(b), as they represent Project-specific measures that would ensure that 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. Impacts will be less than significant.

Project Design Features

PDF-HAZ-1 **Lead-Based Paint.** Prior to any renovations or demolition activities, any suspected lead-based paint shall be sampled. Any identified lead-based paint located within buildings scheduled for renovation or demolition, or noted to be damaged, shall be abated by a licensed lead-based paint abatement contractor, and disposed of according to all state and local regulations.

PDF-HAZ-2 **Asbestos.** Prior to the initiation of demolition work, areas of the on-site structures proposed for removal shall be sampled as part of an asbestos survey in compliance with the National Emission Standards for Hazardous Air Pollutants. If asbestos is found in any building, asbestos-related work, including demolition, involving 100 square feet or more of ACM shall be performed by a licensed asbestos abatement contractor under the supervision of a certified asbestos consultant. Asbestos shall be removed and disposed of in compliance with applicable State laws. Regardless of whether asbestos is identified in the building, prior to demolition of the existing structures the South Coast Air Quality Management District (SCAQMD) shall be notified and a SCAQMD Asbestos

Demolition and Renovation Compliance Checklist shall be submitted to both the SCAQMD and the City of Los Angeles.

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

Less Than Significant Impact. There are no existing or proposed schools located within a quarter mile of the Project Site. The school nearest to the Project Site is St. Paul the Apostle School, located 0.5 miles southeast of the Project Site.[54]

As discussed in response to Threshold 9.a above, potentially hazardous materials such as oil or fuel utilized by heavy-duty construction equipment, may be utilized during construction and would be required to comply with local, state, and federal policies for handling such materials and equipment properly. In addition, the Project Site is located in a methane buffer zone; therefore, development of the Project would require the proper site investigations and potential installation of a methane mitigation system in accordance with City regulations as described in Threshold 9.b above. As discussed in Subsection 3, Air Quality, emissions generated by construction of the Project would be below SCAQMD LSTs and, therefore, would not be significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to the emission or handling of hazardous materials in proximity to a school. These include Mitigation Measure HAZ-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As described in the impact analysis above, the Project would not emit or handle hazardous materials in proximity to a school. Therefore, the measures included in Mitigation Measure HAZ-1(b) are not applicable to the Project, and no impact would occur.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and to submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact could occur if the Project Site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and development of the Project would create a significant hazard to the public or the environment.

The Phase I ESA performed a database search for known hazardous materials contamination at the Project Site in 2016. A follow up review of the Department of Toxic Substances Control's (DTSC) Cortese List was conducted by Rincon Consultants in 2020. The 2016 Phase I database search, and the 2020 follow up review of the DTSC Cortese List, did not indicate the presence of any known hazardous materials on the Project Site. Section 4.1.2 *Listings for Nearby Sites with*

[54] *The existing childcare facility at the Project Site will remain until the new one is constructed and ready to occupy, at which time the existing facility will be demolished to make way for construction of the Eldercare Facility.*

Potential to Impact Subject Property of the Phase I report contains information pertaining to the following four sites identified through the records search that were characterized as the most likely potential sources of environmental concern for the Project Site (Appendix G)

- A potential dry cleaner located within the office tower at 10850 Wilshire Boulevard, immediately adjacent to Project's western boundary. However, the property was not identified as a site of environmental significance.
- An underground storage tank listing that is likely associated with on-site emergency generators at 10866 Wilshire Boulevard, 300 feet west of the Project Site. No evidence of releases, spills, or leaks was provided, and the property was not identified as a site of environmental significance.
- An underground storage tank listing that is likely associated with on-site emergency generators at 10790 Wilshire Boulevard, 300 feet east of the Project Site. No evidence of releases, spills, or leaks was provided, and the property was not identified as a site of environmental significance.
- A former gasoline underground storage tank listing that resulted in an LUST case at 10877 Wilshire Boulevard, 300 feet northwest of the Project Site. No groundwater impacts were identified, and the case was closed in 1998.

The Phase I ESA concludes that no current or historical uses present any hazardous material environmental concerns for the Project Site. As discussed in Threshold 9.b, the Phase I ESA notes that limited Asbestos-Containing Materials (ACM) abatement was performed during renovation in the Sanctuary in 2012 and recommends that an ACM survey be conducted prior to renovation and demolition activities (Appendix G).

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to the siting of a project on a hazardous materials site. These include Mitigation Measure HAZ-4(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to a project located on a hazardous materials site. Relevant measures of HAZ-4(b) include the following:

- Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.

Consistent with these measures, a Phase I ESA was prepared, and confirmed that the Project Site is not identified as a hazardous materials site. Therefore, there is no potential to create a significant hazard to the public or the environment due to location upon a hazardous materials site, and no mitigation is required. Impacts will be less than significant.

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

No Impact. The Santa Monica Airport, approximately 2.9 miles southwest of the Project Site, is the closest public airport to the Site. The Project Site is not located in an airport influence area or an airport runway protection zone.[55]

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential proximity to an airport, and therefore no mitigation measures would be applicable. Moreover, the Project Site is not an airport influence area or an airport runway protection zone. Therefore, no impact related to airport safety or noise would occur.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The nearest designated disaster routes are Sepulveda Boulevard (north and south of Wilshire), and Wilshire Boulevard (west of Sepulveda), approximately a half mile to the west of the Project Site.[56] The Project would not require the closure of any public or private streets or impede emergency vehicle access to the Project Site or surrounding area. Through the preparation of a Construction Traffic Management Plan, discussed in Subsection 17, Transportation, access would be maintained throughout construction. All materials required for construction would be stored on the Project Site and would not block or impede traffic along Wilshire Boulevard, which borders the Project Site to the north, and is the nearest high volume roadway in the vicinity. Additionally, emergency access to and from the Project Site would be provided in accordance with requirements of the LAFD, which includes the addition of a hammerhead access turn in between the Eldercare Facility and Childcare Facility. The proposed internal hammerhead turn would provide adequate turning radii for emergency response vehicles.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to a potential conflict with an adopted emergency response plan or emergency evacuation plan. These include Mitigation Measure TRA-5(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. These measures include the following:

- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction.

Consistent with this measure, and as described in Subsection 17, Transportation, the Project would implement PDF-T-1, which, consistent with current and standard City policy, would require the preparation of and City approval of a Construction Traffic Management Plan to ensure that

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[55] *County of Los Angeles A-Net GIS Interactive Map. Accessible at: http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a*

[56] *City of Los Angeles – West Area. Disaster Routes Map. 2008. Accessible at: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20West%20Area.pdf*

adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. With implementation of this PDF, which is equal to or more effective than the measures identified by Mitigation Measure TRA-5(b) because it implements a standard City policy for development projects, impacts would be less than significant.

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

No Impact. The Project Site is in an urbanized portion of the City. The Project Site and the surrounding vicinity do not include wildlands or high fire hazard terrain or vegetation. In addition, the Project Site is not located within a Very High Fire Hazard Severity Zone.[57] The Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 of the LAMC establishes fire water flow standards. Additionally, the proposed Eldercare Facility and Childcare Facility would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to wildland fires. These include Mitigation Measure HAZ-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires. As described above, the Project Site is not located in a wildland fire hazard area, and therefore, Mitigation Measure HAZ-8(b) is not applicable. No impact would occur.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Impacts associated with hazards are generally site-specific and would be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing City and State regulatory requirements, including those requiring safe handling of hazardous materials as well as remediation of hazardous conditions. In addition, neither the Project Site nor the related project locations are within designated wildland fire hazard areas. Therefore, no significant cumulative impacts regarding hazards would occur.

[57] *Department of City Planning. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/*

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4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based, in part, on the Water Resources Technical Report, prepared by Psomas, dated June 5, 2020. This report is included as Appendix H of the SCEA.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. As discussed in the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction Impacts

Temporary site preparation, grading, and paving activities associated with the Project may result in soil erosion that could degrade water quality. The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting system and the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance Nos. 172,176 and 173,494) to ensure pollutant loads from the Project site are minimized for downstream receiving waters. These ordinances contain requirements for construction activities and operation of Projects to integrate Low Impact Design (LID) practices and standards for stormwater pollution mitigation, and maximize open, green, and pervious space on all Projects consistent with the City's landscape ordinance and other related requirements in the City's Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City's building plan review and approval process for individual construction Projects.

The Los Angeles Regional Water Quality Control Board (LARWQCB) adopted the latest Municipal Separate Storm Sewer System (MS4) NPDES Permit in December 2012. The MS4 permit requires new development and redevelopment Projects to incorporate stormwater mitigation measures. Under the conditions of the permit, the Project applicant would be required to eliminate or reduce non-stormwater discharges, develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for Project construction activities, and perform inspections of the stormwater pollution prevention measures and control practices to ensure conformance with the Project Site SWPPP. The state permit prohibits the discharge of materials other than stormwater, and prohibits all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4. The state permit also specifies that construction activities must meet applicable provisions of Sections 30 and 402 of the CWA. Conformance with Section 402 of the CWA would ensure that the Project would not violate any water quality standards or waste discharge requirements. Similarly, compliance with construction-related BMPs and/or the SWPPP would control and minimize erosion and siltation.

Any dewatering activities during construction would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, NPDES No. CAG994004) or subsequent permit.[58] An NPDES Permit for Groundwater Discharge from the Los Angeles Regional Water Quality Control Board (LARWQB) would be necessary should groundwater be discharged to a sewer or storm drain. This will include submission of a Notice of Intent for coverage under the permit to the LARWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

Compliance with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) would reduce the Project's potential impacts related to surface runoff and water quality to less than significant levels.

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[58] *Los Angeles Regional Water Quality Control Board. General NPDES Permit No. CAG994004. Web Accessible from: https://www.waterboards.ca.gov/losangeles/board_decisions/tentative_orders/general/npdes/cag994004a/index.shtml*

Operational Impacts

Under the City's Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of private catch basins, planter drains, and roof downspouts throughout the Project Site to collect roof and site runoff. Building roof runoff, would be collected via roof drains and routed internally through the buildings and directed into the harvesting tank. Prior to connection to the harvesting tank, downspout filters would be installed to remove any debris that enters the on-site piping system. In addition, permeable pavement is proposed on-site to reduce the overall stormwater runoff. All other stormwater runoff would be collected via private on-site catch basins or trench drains fitted with an insert to collect debris and sediment and routed to the harvesting tank (Appendix H). As the majority of potential contaminants are anticipated to be contained within the "first flush" storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing site is approximately 90 percent impervious and consists of buildings, paved surface lots, and landscape areas. Implementation of the Project would remain approximately 90 percent impervious once Project improvements, landscaping, and amenities are installed (Appendix H). The Project includes the installation of private catch basins, planter drains, and roof downspouts throughout the Project site to collect roof and site runoff, and direct stormwater to the LID system through a series of underground storm drain pipes, which would control stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant.

Groundwater Quality

Construction Impacts

As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are expected to encounter groundwater and temporary dewatering is anticipated. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements. As discussed in Threshold 10.a, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in coastal Watersheds of Los Angeles and Ventura Counties. In addition, the proposed construction activities would be typical of a residential project and would not involve activities that could further impact the underlying groundwater quality.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of an UST. However, as discussed in Subsection 9, Hazards and Hazardous Materials, no existing USTs are anticipated to be found beneath the Project Site. Therefore, the removal of USTs would not pose a significant hazard on groundwater quality. In addition, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operational Impacts

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater, which are not proposed. In addition, while the Project would introduce more density and an additional land use (residential) to the Project Site which would slightly increase the use of potentially hazardous materials as described above, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project also does not include the installation or operation of water wells, or any extraction or recharge system near the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility.

In addition, the Project includes the installation of a capture and use as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. These measures include the following:

- Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
- Implement Best Management Practices to reduce the peak stormwater runoff from the Project Site to the maximum extent practicable.
- Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.

- Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the Project Site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.
- Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

As discussed above, there is no potential for the Project to violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality, and no mitigation is required. Furthermore, consistent with this measure, and as described in the impact analysis above, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building plan review and approval process for the Project. Through compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure HYD-1(b), implementation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, the Project's impacts will be less than significant.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies City residents with potable recycled water. Due to limited local water resources, LADWP depends heavily on imported water purchased from the Metropolitan Water District. However, local groundwater supplies are an important piece of LADWP's water portfolio, providing up to 23 percent of total supply in drought years.[59] Because the Southern California region is water-limited, groundwater resources are tightly managed to prevent over-extraction and depletion of groundwater supplies. LADWP is entitled to extract 109,809 acre-feet per year from groundwater resources, with the majority of entitled water, 87,000 acre-feet coming from the San Fernando Basin.[60]

Construction activities for the Project would include demolition of the existing Church administrative offices, preschool, and fellowship hall, along with the existing surface parking lots and the Church-owned single-family residence and excavation to a depth of 43 feet below grade. Temporary dewatering operations are expected based on the historic high groundwater level of 25 feet below the existing grade. If groundwater is encountered during construction, minor

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[59] *Los Angeles Department of Water and Power (LADWP). 2013. Sources of Supply: Groundwater. Last modified: 2013. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-local-grndwter?_adf.ctrl-state=k1xs7bv0q_4&_afrLoop=912609557922233 (accessed April 2018).*

[60] *Los Angeles Department of Water and Power (LADWP). 2013. Sources of Supply: Groundwater. Last modified: 2013. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-local-grndwter?_adf.ctrl-state=k1xs7bv0q_4&_afrLoop=912609557922233.*

dewatering of groundwater seepage via gravel-filled trenches would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, given the historic-high groundwater level at the Project Site, a permanent subdrain system may need to be designed for the Project's basement or the footings. As required by the LAMC, the Project applicant would provide a final design-level geotechnical report which would include the primary recommendations of the preliminary Geotechnical Investigation (Appendix F of this SCEA). Installation of a permanent subdrain is one of the recommendations listed in the preliminary investigation, and the final design-level geotechnical report recommendations would be enforced by LADBS for the construction of the Project. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

In regard to groundwater recharge, the Project Site is currently developed with impervious surfaces and provides little groundwater recharge potential. There would be no change to the percentage of impervious surfaces and 90 percent of the Project Site would remain impermeable. The underground footprint of the Project's improvements would be limited to the subterranean parking garage and landscaping would span the property, and thus the groundwater recharge potential would remain minimal. Therefore, the Project would not substantially impact the amount of groundwater recharge occurring on-site and would not result in a lowering of the local groundwater table.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. These measures include the following:

- For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.
- Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.

As discussed above, no potential groundwater impacts have been identified for the Project, and no mitigation is required. Furthermore, consistent with these measures, and as described in the impact analysis above, should the Project require temporary or permanent dewatering, it would be performed in compliance with all applicable regulatory requirements regarding water quality. Furthermore, because the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. Therefore, through regulatory compliance and the Project's infill development characteristics, which would be equal to or more effective than Mitigation HYD-2(b), impacts would be less than significant.

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

i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. 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. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

As discussed in Threshold 10.a, implementation of the Project would result in approximately 90 percent impervious surfaces, similar to existing conditions. As such, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, operation of the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing potential impacts regarding erosion or siltation. As discussed above, no potential erosion impacts have been identified for the Project, and no mitigation is required. Furthermore, as described above under Threshold 6.b (Geology/erosion) as well as Threshold 10.a (1st hydrology threshold), the Project will comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and State and local requirements regarding stormwater management. Through compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure HYD-1(b), impacts will be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. There are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Threshold 10.c.i, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with applicable City grading permit regulations, construction

activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site, and impacts would be less than significant.

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use BMPs as established by the LID Manual to prevent upstream flooding during major storm events. Therefore, with implementation of BMPs the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and operational impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing potential impacts regarding runoff and flooding. No potential impacts pertaining to runoff or flooding have been identified for the Project, and no mitigation is required. Furthermore, as described above under Threshold 7.b as well as Threshold 10.a, the Project will comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and State and local requirements regarding stormwater management. Through compliance with these regulatory requirements, which are equal to or more effective than Mitigation Measure HYD-1(b), impacts will be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The Project Site is currently developed and generally consists of impervious surface parking, buildings, impervious pavement for pedestrian and vehicular circulation, and landscaped areas. The Project Site is approximately 90 percent impervious and is not crossed by any water courses or rivers. Currently, stormwater runoff from the Project Site drains via surface runoff towards Ashton Avenue, continue through the street's gutter system until it reaches the existing City of Los Angeles storm drain catch basin on the northeast corner of Holman Ave and Glendon Avenue. This catch basin ultimately connects to an existing City of Los Angeles 39 inch storm drain main line in Glendon Avenue (Appendix H).

As previously discussed, operation of the Project would result in approximately 90 percent impervious surface area within the Project Site. The Project would include the installation of building roof drain downspouts, area drains, and planter drains to collect roof and site runoff. Furthermore, based on the volumetric flow rate analysis provided in the Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rate indicated that there would be no increase in stormwater runoff (Appendix H). In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental

impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing potential impacts regarding runoff and flooding. As previously noted, no potential impacts regarding runoff and flooding have been identified for the Project, and no mitigation is required. Furthermore, as described above under Threshold 7.b as well as Threshold 10.a, the Project will comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and State and local requirements regarding stormwater management. Through compliance with these regulatory requirements, which are consistent with the measures under Mitigation Measure HYD-1(b), impacts will be less than significant.

iv) Impede or redirect flood flows?

No Impact. The Project Site is located in Zone X of the FEMA Flood Insurance Rate Map (FIRM) (#06037C1590F; September 26, 2008).[61] Zone X is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance for a flood. In addition to the low risk of flooding, the Project would implement capture and use BMPs to retain stormwater runoff onsite.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. As discussed in the impact analysis above, the Project Site is not located in a flood zone, and therefore Mitigation Measure HYD-8(b) is not applicable. Moreover, the Project would implement capture and reuse stormwater BMPs to retain stormwater onsite. No impacts would occur.

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

Less Than Significant Impact. The discussion is focused on whether the Project would place housing in a 100-year flood zone; or be located within a 100-year flood zone, which would impede or redirect flood flows. A significant impact may occur if a Project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure. In addition, a significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

Flood Hazard Areas

The Project Site is located in Zone X of the FEMA Flood Insurance Rate Map (FIRM) (#06037C1590F; September 26, 2008). Zone X is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance for a flood. In addition, Exhibit F of the

[61] *Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (FIRM) #06037C1590F. September 26, 2008.*

City's Safety Element, *100-Year & 500-Year Flood Plains*, indicates that the Project Site is not within a 100- or 500-year flood plain area (Los Angeles 1996).

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. As discussed in the impact analysis above, the Project Site is not located in a flood zone, and therefore Mitigation Measure HYD-8(b) is not applicable. Impacts would be less than significant.

Dam Failure

As discussed above, the Project Site is not located within a 100-year flood hazard area, and Exhibit G, *Inundation & Tsunami Hazard Areas*, of the Safety Element of the City's General Plan indicates that the Project Site is not in a flood control basin. Although the Project Site is not located in a potential inundation area, it is located approximately 1,000 feet from a potential inundation area for the Stone Canyon Reservoir, which is approximately two miles northeast. The dam is continually monitored by various governmental agencies to prevent dam failure and to ensure that the dam is capable of withstanding the maximum potential earthquake for the site. In accordance with these regulations, Stone Canyon Dam is regularly inspected and meets safety regulations. Should dam failure occur despite safeguards, LADWP has emergency response plans in place to address dam failure and potential impacts.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts of locating structures in areas subject to flooding. As discussed in the impact analysis above, the Project Site is not located in a potential inundation area, and therefore, Mitigation Measure HYD-8(b) is not applicable. Moreover, existing regulatory requirements and dam safety protocols further ensure that the Project Site is safe from dam failure hazards.

Seiche, Tsunami, Mudflow

The Project site lies outside of a tsunami hazard area (City of Los Angeles 1996 [Exhibit G]). In addition, the Project site does not lie near a large body of water that could experience a seiche. In addition, the Project Site is not located in an area identified to have potential for seismic slope instability or in the path of any known or potential landslides (Wood 2019). Therefore, the Project would not be vulnerable to mudflow.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to hydrology and water quality. These include Mitigation Measure HYD-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts of locating structures in areas subject to inundation from tsunamis.

As discussed in the impact analysis above, the Project Site is not located in a tsunami hazard area, and therefore, Mitigation Measure HYD-8(b) is not applicable.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The Project proposes the development of a new Eldercare Facility and a Childcare Facility; such uses would not be expected to impact any water quality control measures. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Water Resources Technical Report, the Project Site is located within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include Cadmium (sediment), Coliform (bacteria), Copper, Cyanide, Lead, Selenium, Toxicity, Trash, Viruses, and Zinc (Appendix H).

As discussed in Threshold 10.a, the Project would be required to comply with applicable regulatory requirements, including the City's Low Impact Development (LID) regulations and the Standard Urban Stormwater Mitigation Plan, which ensure that Projects address potential runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of storm water flows.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to water quality. These include Mitigation Measure HYD-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential impacts to water resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. These measures include the following:

- For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.
- Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.

As discussed above, no potential impacts regarding conflicts with a water quality control plan or sustainable groundwater management plan have been identified, and no mitigation is required. Furthermore, consistent with these measures, and as described in the impact analysis above and under Threshold 10.b, should the Project require temporary or permanent dewatering, it would be performed in compliance with all applicable regulatory requirements. In addition, because the Project Site is currently developed and provides little groundwater recharge potential, the construction of the Project would not substantially impact the amount of groundwater recharge occurring on-site. Therefore, through regulatory compliance and the Project's infill development characteristics which would be equal to or more effective than Mitigation HYD-2(b), impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The Project and all related projects would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would reduce impacts to a less than significant level. Furthermore, the Project would not result in any water quality related impacts and would not increase peak stormwater flows from the Project Site. Therefore, the Project would not contribute to a cumulative impact regarding hydrology and water quality.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

No Impact. The Project Site is currently occupied by a Sanctuary, preschool classrooms, administrative offices, Fellowship Hall, and ancillary spaces as well as paved parking areas. The southeastern portion of the Project Site (10812 Ashton Avenue) is occupied by a Church-owned single-family home and additional paved parking areas. All existing Project Site improvements, with the exception of the Sanctuary, would be removed to allow for development of the Project. The proposed use would be compatible with surrounding mixed uses and would not involve construction of any new infrastructure (such as a new road) that would divide the Project Site or surrounding area. Access to and circulation through the Project Site would continue to be maintained via a driveway along Wilshire Boulevard and along Ashton Avenue.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to land use and planning. These include Mitigation Measure LU-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. As described in the impact analysis above, the Project would not physically divide an established community. Therefore, the measures included in Mitigation Measure LU-2(b) are not applicable to the Project, and no impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site.

A project is considered consistent with the provisions and general policies of an applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plans and would not preclude the attainment of its primary goals.[62] More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs

[62] *Sequoyah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 719.*

specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

Various local and regional plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of SCAG's RTP/SCS, the City's General Plan (including the Framework Element, the Housing Element, Conservation Element, and Mobility Plan 2035), the Westwood Community Plan, the LAMC (including the City's Eldercare Ordinance), and the Wilshire-Westwood Scenic Corridor Specific Plan, to the extent that various goals, objectives, and policies of these plans have been adopted for the purpose of avoiding or mitigating an environmental effect. The Project's consistency with certain other goals, objectives, and policies that do not directly relate to the avoidance or mitigation of environmental effects is also briefly discussed for informational purposes.

Southern California Association of Governments (SCAG)

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

The 2016–2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2040. More importantly, the 2016–2040 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2016–2040 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. A detailed discussion of the Project's consistency with the 2016–2040 RTP/SCS, as they pertain to reducing greenhouse gas emissions, is included in Subsection 8, Greenhouse Gas Emissions. A consistency analysis with the RTP/SCS general goals and policies is included below. As discussed there, the Project would be substantially consistent with the applicable 2016–2040 RTP/SCS policies and goals.

On September 3, 2020, SCAG's Regional Council approved and adopted the Connect SoCal plan (2020–2045 RTP/SCS). Similar to the 2016-2040 RTP/SCS, the 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles (including the 2016-2040 RTP/SCS) to increase mobility options and achieve a more sustainable growth pattern, while achieving CARB's GHG reduction targets. CARB has not yet certified the 2020-2045 RTP/SCS; accordingly, this SCEA primarily assesses the Project in relation to the 2016-2040 RTP/SCS. However, as noted below, the goals and policies of the 2020-2045 RTP/SCS are functionally equivalent to those of the 2016-2045 RTP/SCS, and as an infill development project located within a TPA, the Project is consistent with both the current and the pending RTP/SCS.

Table 4-15
Consistency Analysis with the 2016-2040 RTP/SCS

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and does not apply to individual development projects such as the Project.
Goal 2 Maximize mobility and accessibility for all people and goods in the region.	**No Conflict.** The Project Site is located in a highly urbanized area with the City of Los Angeles within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project would develop 176 residential units as well as replacement preschool and Church administrative space at the Project Site, which is well-served by existing and future transit infrastructure. Specifically, the Project Site is located less than one-quarter mile (approximately 900 feet) from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA station of Metro's Purple Line Extension currently scheduled to open in 2027. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. In addition, the Project Site is adjacent to existing commercial and recreational development, including banks, theaters, a church, and other retail uses. Therefore, the location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal. Note that Goal 2 of the 2020-2045 RTP/SCS ("Improve mobility, accessibility, reliability, and travel safety for all people and goods") is functionally equivalent to Goal 2 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 3 Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to individual development projects such as the Project. Nevertheless, the Project would improve public safety infrastructure near the Project Site by providing new lighting within the Site and around the perimeter including new building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. Pedestrian access to the Project would be distinct from vehicle driveways and the Project would not mix pedestrian and automobile traffic to ensure pedestrian safety. In addition, the Project would be subject to the site plan review requirements of the City of Los Angeles and undergo review by the Department of Building and Safety, Los Angeles Department of Transportation, and the Los Angeles Fire Department to ensure that all access roads, driveways and parking areas would not create a design hazard to local roadways. Note that Goal 2 of the 2020-2045 RTP/SCS ("Improve mobility, accessibility, reliability, and travel safety for all people and goods") is functionally equivalent to Goal 3 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 4 Preserve and ensure a sustainable regional transportation system.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to individual development projects such as the Project. Nevertheless, the Project would minimize impacts on the existing roadway system by placing new senior housing as well as neighborhood-serving institutional uses near transit, and providing bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Moreover, due to its proximity to numerous existing transit lines as well as future rail service, the Project also encourages increased rail and transit use, thereby contributing to increased ridership and sustainability of the City's multimodal transportation system in the region.

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
	Furthermore, as discussed in the Project's transportation assessments (located in Appendix K), the Project would not create a significant impact at any of the study intersections or roadways, nor would it result in any VMT impacts. Note that Goal 3 of the 2020-2045 RTP/SCS ("Enhance the preservation, security, and resilience of the regional transportation system") is functionally equivalent to Goal 4 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 5 Maximize the productivity of our transportation system.	**No Conflict.** This Goal is directed towards SCAG and does not apply to the Project. Nevertheless, the Project would encourage the use of mass transit, walking and bicycling, as the Project would locate new residential uses and institutional uses on the Project Site in close proximity to numerous bus lines as well as future rail service. Thus, the Project would contribute to the productivity and use of the regional transportation system by providing housing and job opportunities near transit. Moreover, as discussed in the Project's transportation assessments (located in Appendix K), the Project would not create a significant impact at any of the study intersections or roadways, nor result in any VMT impacts. Note that Goal 4 of the 2020-2045 RTP/SCS ("Increase person and goods movement and travel choices within the transportation system") is functionally equivalent to Goal 5 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**No Conflict.** The Project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality. The Project includes 70 bicycle parking spaces, and would encourage pedestrian travel by locating new residential and institutional uses on the Project Site within walking distance of businesses in the area, and in close proximity to multiple transit options. Furthermore, the Project would include pedestrian-friendly landscaping and design, a new street level plaza, and streetscape improvements that would enliven the pedestrian experience. These design features help reduce vehicle miles traveled and help improve air quality. Note that Goal 5 of the 2020-2045 RTP/SCS ("Reduce greenhouse gas emissions and improve air quality") is functionally equivalent to Goal 6 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 7 Actively encourage and create incentives for energy efficiency, where possible.	**No Conflict.** As described with regard to Goal 6, above, the Project would be consistent with this Goal by reducing passenger car trips and encouraging and supporting transit, which reduces transportation energy demand. In addition, the Project would be required to comply with California Building Code Title 24. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, building designs meeting LEED Silver sustainability ratings, cool roof systems, use of Energy Star appliances, and allocated rooftop space for solar panels. In addition, 30 percent of the Project's total parking spaces would be capable of supporting future electric vehicle supply equipment (EVSE), while 10 percent of parking spaces would be equipped with electric vehicle (EV) charging stations. Note that Goal 5 of the 2020-2045 RTP/SCS ("Reduce greenhouse gas emissions and improve air quality") is functionally equivalent to Goal 7 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	**No Conflict.** As stated above, the Project Site is located within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. Specifically, the Project Site is located approximately 900 feet from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by Metro's D (Purple) rail line Westwood/UCLA station currently scheduled to open in 2027. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. In addition, the Project Site is

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
	adjacent to existing commercial and recreational development, including banks, theaters, a church, and other retail uses. Therefore, the location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal. Note that Goal 6 of the 2020-2045 RTP/SCS ("Support healthy and equitable communities") is functionally equivalent to Goal 8 of the 2016-2040 RTP/SCS; therefore, the above consistency analysis remains the same.
Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable.** This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required for individual projects such as the Project.
Guiding Policy 1 Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to individual development projects; therefore, no further analysis is required.
2016-2040 RTP/SCS Guiding Policy 2 Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system. The Project would include pedestrian-friendly landscaping and design, a new street level plaza, and streetscape improvements that would enliven the pedestrian experience and promote walkability on the Project Site and in the area. As discussed in the Project's transportation assessments (located in Appendix K), the Project would not create a significant impact at any of the study intersections or roadways or result in any VMT impacts.
Guiding Policy 3 RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and does not apply directly to the Project. The Project would develop new residential and institutional uses within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment, and also promotes the use of a variety of transportation options, including walking, biking, and the use of public transportation.
Guiding Policy 4 Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG and does not apply to individual projects such as the Project. However, the Project Site's location within a HQTA and a TPA promotes the use of public transit and pedestrian and bicycle activity.
Guiding Policy 5 HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Although this policy is not applicable to the Project, the Project's location in a HQTA promotes the use of public transit and pedestrian activity.
Guiding Policy 6 The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable.** This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. Nevertheless, the Project is located within a HQTA as defined by SCAG and a transit priority area as defined by SB 743, and as such, would support public transportation and other alternative methods of transportation that reduce single-occupancy vehicle use.

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
Guiding Policy 7 The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	**Not Applicable.** This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments and does not apply to individual projects such as the Project.
Guiding Policy 8 Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	**Not Applicable.** This policy is directed towards SCAG and the City of Los Angeles and does not apply to individual projects such as the Project.
Land Use Policy 1 Identify regional strategic areas for infill and investment.	**Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas. Notwithstanding, the Project is an infill development in a HQTA defined by SCAG and within a transit priority area as defined by SB 743, and would provide residential units and institutional uses in a highly urbanized area within the City of Los Angeles.
Land Use Policy 2 Structure the plan on a three-tiered system of centers development.[63]	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Project.
Land Use Policy 3 Develop "Complete Communities."	**No Conflict.** SCAG describes the development of "complete communities" as providing areas that encourage households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.[64] As stated above, the Project would develop residential units and institutional uses in a transit-rich area. The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. Therefore, the Project would be consistent with the SCAG's goals of increasing mixed uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicle miles traveled.
Land Use Policy 4 Develop nodes on a corridor.	**Not Applicable.** The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and City goals to identify and develop locations that promote nodes. On a project level, the Project is an infill development along Wilshire Boulevard, located within a HQTA and a transit priority area. The Project's design and location encourages the use of alternative transportation and walking and bicycling opportunities.

[63] *The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

[64] *SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).*

2016-2040 RTP/SCS Goals and Policies	Consistency Assessment
Land Use Policy 5 Plan for additional housing and jobs near transit.	**No Conflict.** As stated above, the Project would develop residential units and institutional uses in a HQTA and a transit priority area. Specifically, the Project Site is located less than one-quarter mile (approximately 900 feet) from the intersection of Wilshire and Westwood Boulevards, which is served by at least two major bus lines (e.g., Santa Monica Big Blue Bus 12 and Metro Rapid 720) with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. In addition, this intersection would be served by the Westwood/UCLA station of Metro's Purple Line Extension currently scheduled to open in 2027. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. In addition, the Project Site is adjacent to existing commercial and recreational development, including banks, theaters, a church, and other retail uses. Therefore, the location of the Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Land Use Policy 6 Plan for changing demand in types of housing.	**No Conflict.** The Project would develop new senior independent and assisted living housing units in order to directly meet the strong demand for additional senior housing in the City of Los Angeles. Therefore, the Project is consistent with this policy.
Land Use Policy 7 Continue to protect stable, existing single-family areas.	**No Conflict.** The Project's Eldercare Facility is located within the portion of the Project Site that is zoned for high-density residential uses, while the Childcare Facility would be located on the southern portion of the Project Site that is zoned for single-family residential uses, and which allows institutional uses pursuant to approval of a conditional use permit. The southern portion of the Project Site is currently improved with one single-family residence and a surface parking lot, both of which would be removed to allow for development of the Project. The proposed lower scale and intensity of the development on the southern portion of the Site would assist with the protection of the existing nearby single-family areas.
Land Use Policy 8 Ensure adequate access to open space and preservation of habitat.	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not directly apply to the Project. Nevertheless, the Project is located within an urbanized area within the City of Los Angeles. Development of the Project would not remove any existing open space areas or habitat, since the Project Site is fully developed. The Project would provide approximately 5,040 square feet of landscaped space and new trees would be provided in conformance with the LAMC and City policies.
Land Use Policy 9 Incorporate local input and feedback on future growth.	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Project.
Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016.	

City of Los Angeles General Plan

Framework Element

The Framework Element sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. Chapters that specifically address environmental effects in some way applicable to the Project include Land Use, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts, and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. However, these land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as guidelines for the Community Plans.[65]

Based on the Framework Element, the Project is located immediately adjacent to a designated Regional Center, encompassing Westwood Village and surrounding areas. A Regional Center is defined as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Regional Centers are usually major transportation hubs.

As described below, the Westwood Community Plan designates the northern portion of the Project Site for High Residential land uses, while the southern portion of the Project Site is designated for Low Residential uses. The Land Use Chapter identifies the High Residential land use designation as allowing between 110 and 218 units per acre, along with supporting uses such as parks, schools, and community centers, and identifies the R5 zone as correlating to these contemplated densities and uses. The Land Use Chapter further identifies the Low Residential land use designation as allowing single-family dwelling uses, along with supporting uses such as parks, schools, and community centers, and identifies the R1 zone as correlating to these contemplated uses.

The proposed Eldercare Facility's location along Wilshire Boulevard and within the Specific Plan is consistent with the Land Use Chapter's description of High Residential land uses, while the proposed Childcare Facility's proposed school-related uses and contemplated development envelope is consistent with the Low Residential land use designation. Furthermore, the Project will comply with numerous relevant goals, objectives, and policies set forth in the Land Use Chapter, as identified in Table 4-16 below.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes the goal of creating a livable city for existing and future residents that is attractive to future investment, and a city of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales. Within this chapter, "urban form" is defined as the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, open space, public facilities, as well as activity centers and focal elements. "Neighborhood design" is defined as the physical character of neighborhoods and communities within the City. The Framework Element does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the Community Plans.

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[65] *As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.*

The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

The Project's consistency with this Framework Element chapter is provided in Table 4-16, below. As described therein, the Project would be generally consistent with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element. Specifically, the Project Site directly fronts upon Wilshire Boulevard and has convenient access to public transit along Wilshire with multiple intersecting lines immediately west of the Project Site at Westwood Boulevard. In addition, the Project would bring new senior residential uses to the Project Site and enhance the existing streetscape along Wilshire Boulevard to make it more active and pedestrian-friendly. Collectively, these measures would help to reduce VMT. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter that seek to avoid or mitigate an environmental effect.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City's residents; and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City's open space issues.

The Project's consistency with this Framework Element chapter is provided in Table 4-16, below. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element. The Project is located along Wilshire Boulevard, a densely developed mixed-use corridor, and does not encroach on the City's natural resources. The Project would include new landscaped areas and new street trees, as well as exterior and interior open space for its senior residents. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

Infrastructure and Public Services Chapter

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems (many of which are interrelated), including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services, where appropriate. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with the Framework Element's Infrastructure and Public Services Chapter is shown in Table 4-16, below. As described therein, the Project would comply with the City's grading permit regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As evaluated in Subsection 19, Utilities and Service Systems, LADWP would be able to meet the water demand for the Project

as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. Section 15 of the Conservation Element establishes the objective and policy for the protection of natural and scenic vistas as aesthetic resources. As stated therein, it is the City's policy to encourage development that would protect significant landforms and unique scenic features, such as ridgelines, bluffs, mountains, and other unique natural or geologic features. In addition, the City would also encourage, to the greatest extent practical, the preservation of public views and access to these visual resources.

As discussed in Subsections 2, 5, and 12, the Project would have no impact on agricultural lands, endangered species, habitat areas, or mineral resource areas. In addition, as discussed in Subsections 5 and 7, the Project would implement mitigation measures to reduce potential impacts to archaeological resources and paleontological resources, and as discussed in Subsection 5, the Project would not result in direct or indirect impacts to the historic on-site Sanctuary, and with implementation of mitigation as discussed in Subsection 13, Noise, would not result in direct or indirect impacts to the historic off-site cemetery and mortuary. Furthermore, as analyzed in Subsection 1, Aesthetics, in addition to not resulting in any aesthetic impacts due to SB 743 and Public Resources Code Section 21099, the Project would not impair any existing views of scenic vistas or scenic resources. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Conservation Element that seek to avoid or mitigate an environmental effect.

Housing Element

The Housing Element 2013–2021 of the City's General Plan identifies four primary goals and associated objectives, policies, and programs. The goals are as follows:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;
- A City in which housing helps to create safe, livable and sustainable neighborhoods;
- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

The Project's consistency with the applicable policies set forth in the Housing Element is analyzed in Table 4-16, below. As described therein, the Project will provide 176 new high-quality eldercare dwelling units and guest rooms that will include independent living units, assisted living units, and

memory care units, thereby directly providing a diverse range of new housing opportunities for the City's elderly residents. The Project will provide these new housing opportunities for seniors in direct proximity to Wilshire Boulevard's diverse residential and commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro's Rapid and local bus lines in the vicinity of the Project Site. Moreover, the Project will further contribute to an active pedestrian environment through its landscaping, street tree planting, and other streetscape improvements. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen, and will achieve LEED Silver equivalency. These standards would reduce energy, water usage, and waste generation, thereby reducing associated greenhouse gas emissions and minimizing the impact on natural resources and infrastructure. Therefore, as detailed in Table 4-16, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

Transportation Element/Mobility Plan 2035

The Transportation Element of the General Plan was adopted by the City in September 1999. As an update to the Transportation Element, the City Council has adopted Mobility Plan 2035 ("Mobility Plan"), which has the overarching goal of achieving a transportation system that balances the needs of all road users. The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in Table 4-16. Specifically, the Project would support the Mobility Plan policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan pursuant to PDF-T-1, which would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project also recognizes all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. In addition, the Project's proximity to a variety of public transit options would provide all residents, workers, and visitors convenient access to public transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

Westwood Community Plan

The Westwood Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. Last updated in 1999, the specific purpose of the Community Plan is to "maintain the community's distinctive character by:

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities.
- Improving the function, design and economic vitality of the commercial corridors.
- Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around future transit systems while minimizing any adverse impacts on residential neighborhoods.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base and through design guidelines and physical improvements, enhancing the appearance of these areas."

The Project will provide new housing opportunities for seniors at a location designated for high-density and high-rise residential development, while retaining existing community-serving church-related uses and minimizing potential impacts upon existing residential neighborhoods. The Project will also advance a number of other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in Table 4-17, below. As set forth therein, the Project would be consistent with the applicable objectives and policies set forth in the Community Plan.

Wilshire-Westwood Scenic Corridor Specific Plan

Pursuant to Government Code Section 65450 et seq., a specific plan is a land use mechanism for systematically implementing the general plan for a prescribed geographic area. The Wilshire-Westwood Scenic Corridor Specific Plan was first adopted by the City in 1981, and last updated in 2005.

The purpose of the Wilshire-Westwood Scenic Corridor Specific Plan is set forth in Section 3, which states: "It is the purpose of the development standards established in this Plan to minimize traffic and parking problems along Wilshire Boulevard, enhance the aesthetic qualities of the Specific Plan area, encourage more open space, reduce the impact of high-density residential development and reduce the impact of shadows caused by high-rise buildings within and adjacent to the Specific Plan Area." As set forth in Table 4-18 below, the Project is generally consistent with the goals, objectives, and policies of the Wilshire-Westwood Scenic Corridor Specific Plan, and is also consistent with the purpose and policies of the City's Eldercare Ordinance, which permits deviations from specific plan regulations in connection with the City's discretionary approval of an Eldercare Facility Unified Permit. Furthermore, as discussed in Subsections 1 (Aesthetics) and 17 (Transportation), the Project would not result in any traffic, parking, aesthetics, open space, or shade/shadow effects that would conflict with the Wilshire-Westwood Scenic Corridor Specific Plan. Accordingly, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Wilshire-Westwood Scenic Corridor Specific Plan.

As noted above, the Westwood Community Plan designates the northern portion of the Project Site for High Residential land uses, correlating to the R5 zone, while the southern portion of the Project Site is designated for Low Residential uses, correlating to the R1 zone. The Wilshire-Westwood Scenic Corridor Specific Plan also provides that all areas within its boundaries are to be zoned [Q]R5, with the Q condition requiring Design Review Board approval for all projects containing more than two units.[66]

On the City's ZIMAS system, the southernmost approximately 85-foot portion of the Project Site that is located within the Wilshire-Westwood Scenic Corridor Specific Plan and zoned [Q]R5 is identified as being subject to the same Low Density Residential designation as the R1-zoned portion of the Project Site that is located outside of the Wilshire-Westwood Scenic Corridor Specific Plan. This Low Density Residential designation appears to be the result of an erroneous association of this portion of the Project Site with the adjacent cemetery property to the west, in conjunction with the City's 1995 cleanup of Open Space zones and designations that affected the cemetery property.[67]

Notwithstanding this 1995 designation, the City later amended the Wilshire-Westwood Scenic Corridor Specific Plan in 2005, and as part of that amendment, re-stated the geographic boundaries of the Wilshire-Westwood Scenic Corridor Specific Plan and reaffirmed that the entire [Q]R5-zoned portion of the Project Site is located within the Wilshire-Westwood Scenic Corridor

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[66] *See Ordinance No. 163,194.*

[67] *See City Plan Case No. 95-0148 GPC.*

Specific Plan's boundaries.[68] In adopting this amendment, the City Council found that, in conformance with Charter Section 556, the amendment was in conformance with the purposes, intent, and provisions of the General Plan.[69] Accordingly, as the Wilshire-Westwood Scenic Corridor Specific Plan represents the direct implementation of the City's General Plan for the Project Site and other properties within the Wilshire-Westwood Scenic Corridor area, and has been found by the City to be in conformance with the General Plan, the Wilshire-Westwood Scenic Corridor Specific Plan's land use provisions are understood to establish the relevant land use and zoning standards for the entire northern portion of the Project Site, notwithstanding the land use designation information currently shown by ZIMAS.

Los Angeles Zoning Code

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. The Zoning Code establishes objective zoning and development standards but was not adopted to avoid or mitigate environmental impacts. Therefore, no consistency analysis is required for purposes of determining potential impacts under this threshold. However, a brief discussion of the Project's consistency with the Zoning Code is provided below for informational purposes.

The LAMC establishes the zoning for the north portion of the Project Site as [Q]R5-3-O (Multiple Dwelling with Q Condition, Height District 3, Oil Drilling District) and the south portion of the Project Site as R1-1 (One Family, Height District 1). The R5 zone permits high-density multi-family residential units as well as church and childcare uses. The existing Q condition, imposed by Ordinance No. 163,194, requires design review approval by the Westwood Community Design Review Board for all new Projects with two or more units. Height District No. 3, in conjunction with the R5 zone, normally establishes a maximum FAR of 10:1 and no height limit. However, the Specific Plan imposes a maximum FAR of 8:1 and a height limit of 6 stories/75 feet.

The R1 zone permits single-family residential uses and accessory structures, as well as church and childcare uses pursuant to the approval of a Conditional Use Permit. Height District No. 1, in conjunction with the R1 zone, establishes a maximum height for flat-roofed structures of 28 feet, while LAMC Section 12.08C.5 establishes a maximum Residential Floor Area ratio of 0.45:1 and imposes an encroachment plane methodology for measuring building height.

The Project is seeking approval of an Eldercare Facility Unified Permit, pursuant to the City's Eldercare Ordinance (Ordinance No. 178,063, adopted in December 2006), which was intended to provide a more streamlined entitlement path to enable the establishment of eldercare facilities throughout the City. Specifically, LAMC Section 14.3.1 authorizes the City to permit an Eldercare Facility on a lot or lots located in the A1 through the R3 Zones, or in the RAS3, R4, RAS4 and R5 and all C Zones, when an Eldercare Facility does not meet the use, area, or height provisions of the respective zone contained in Chapter 1 of the LAMC, or the requirements of any specific plan, supplemental use district, "T" classification, "Q" condition, "D" limitation, or Citywide regulation adopted or imposed by City action.

The Project includes construction of a new 12-story Eldercare Facility at the northern portion of the Project Site (the above-grade portions of the building will be entirely located within the [Q]R5-zoned portion of the Project Site, while a portion of the subterranean parking structure will encroach into the R1-zoned portion of the Project Site). The proposed Eldercare Facility is consistent with the LAMC's definition of an "Eldercare Facility", in that it is "one functionally operated facility which provides residential housing for persons 62 years and older, and which combines in one facility, two or more of the following types of uses: includes Senior Independent

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[68] *See Ordinance No. 176,417.*

[69] *See City Plan Case No. 2003-7784-SP-CA, Director's Findings, December 6, 2004.*

Housing, Assisted Living Care Housing, Skilled Nursing Care Housing, and/or Alzheimer's/Dementia Care Housing. A minimum of 75% of the floor area, exclusive of common areas, shall consist of Senior Independent Housing and/or Assisted Living Care Housing."

The Eldercare Facility contains a total of 176 dwelling units and guest rooms consisting of 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, and 46 Alzheimer's/Dementia Care Housing guest rooms, as well as associated residential amenity and service areas. The new facility will be licensed by the State of California, and more than 75 percent of the floor area exclusive of common areas is dedicated to Senior Independent Housing and Assisted Living Care Housing in accordance with the definition of an Eldercare Facility pursuant to LAMC Section 12.03.

In connection with the Eldercare Facility Unified Permit, the Applicant seeks deviations from the LAMC's zoning regulations, as well as certain provisions contained in the Specific Plan, in order to enable and facilitate development of the proposed Eldercare Facility on the Project Site. In connection with the Childcare Facility, the Applicant also seeks deviations from the LAMC's zoning regulations in order to enable and facilitate development of the proposed Childcare Facility on the Project Site.

Table 4-16
Consistency with General Plan Policies

General Plan Objectives/Policies	Analysis of Project Consistency
Framework Element	
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	**No Conflict.** The Project is located along the Wilshire Boulevard corridor in close proximity to multiple public transit options, which would help reduce traffic congestion and improve air quality through a reduction in vehicles traveling to the Project Site. The Project's new 12-story senior residential units will be developed within the high-density residential portion of the Project Site, while the relocated low-rise Church childcare facility and administrative spaces will be developed within the low-density residential portion of the Project Site, thereby achieving compatibility with existing and adjacent development patterns. Furthermore, as detailed in Subsection 15, Public Services, in Subsection 19, Utilities and Service Systems, and in Subsection 6, Energy the agencies that provide public infrastructure and services to the Project Site would have adequate infrastructure and capacity to serve the Project. Thus, the Project would contribute to the achievement of a more livable City.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No Conflict.** The Project would meet housing needs for a growing senior population by providing 176 senior housing dwelling units and guest rooms and would be consistent with regional and local policies that encourage the development of senior housing that is located in close proximity to transportation, social/health services, entertainment, and opportunities for community involvement. Moreover, by retaining the Church's existing Sanctuary and relocating the existing preschool uses to the new Childcare Facility, the Project will maintain existing desirable community-serving uses that complement existing and new residential uses.

General Plan Objectives/Policies	Analysis of Project Consistency
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	**No Conflict.** As detailed in Subsection 15, Public Services, in Subsection 19, Utilities and Service Systems, and in Subsection 6, Energy, the Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. Therefore, the Project would not conflict with this policy.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**No Conflict.** The Project is located along the Wilshire Boulevard corridor in close proximity to multiple public transit options, and will provide vehicular and bicycle parking spaces in conformance with the LAMC. Because the Project would accommodate for senior citizens and provide a variety of amenities on the Project Site, trip reduction rates would be lower than a typical high-rise apartment building. As an urban infill project in close proximity to adjacent commercial, open space, and institutional uses, as well as providing amenities for residents on-site, these features would serve to reduce project generated vehicle trips and reduce vehicle miles traveled. As discussed in Subsection 17, Transportation, the project would not generate VMT in exceedances of City current criteria.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No Conflict.** See analysis for Objective 3-2.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of commercial and industrial districts.	**No Conflict.** The Project's new 12-story Eldercare Facility will be developed within the R5-zoned portion of the Project Site located within the Specific Plan, which accommodates high-density residential uses at FAR of up to 8:1, and which would be lower in height than the residential high-rise towers to the east (within the Specific Plan) and the commercial high-rise towers to the west (within the adjacent Regional Center Commercial designation). The Project's new two-story Childcare Facility would be developed within the R1-zoned portion of the Project Site, which accommodates lower-density residential uses as well as school and church uses pursuant to Conditional Use approval. Accordingly, the siting and design of the Project would maintain the prevailing scale and character of the residential neighborhoods in the vicinity of the Project Site. Furthermore, the addition of senior residents to the Project Site would bring them into close proximity to the nearby commercial district of Westwood Village, as well as existing public services such as libraries and parks, and private services such as medical facilities and retail and restaurant uses. Therefore, the Project would enhance the utilization and character of the adjacent commercial district.
Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.	**No Conflict.** As discussed in Subsection 14, Population and Housing, population and employment growth associated within the Project would be well within SCAG's projections for the Los Angeles Subregion, which serve as the basis for the General Plan Framework's demographics projections and planned provisions of transportation and utility infrastructure and public services. Moreover, as discussed in Subsection 15, Public Services, and Subsection 19, Utilities and Service Systems, the Project would incrementally increase water demand, wastewater generation, solid waste generation, and demand for public services, but would have a less than significant impact on these services and utilities. Therefore, the Project would be consistent with this objective.

General Plan Objectives/Policies	Analysis of Project Consistency
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	**No Conflict.** The Project would support this City goal by providing a new senior residential development as well as replacement Church-affiliated childcare uses that would activate the existing Project Site and serve the existing and future residents of the surrounding community. The proposed high-rise residential and low-rise childcare facility and Church uses would be consistent and compatible with the existing adjacent high- and low-density residential uses surrounding the Project Site. In addition, the housing and employment opportunities created by the Project would encourage future investment in the Westwood Community Plan area.
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	**No Conflict.** The Project is located along the Wilshire Boulevard corridor in close proximity to multiple public transit options.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**No Conflict.** See the consistency analysis for Objective 3.2 and Policy 3.2.4 for a discussion of how the Project would reinforce and encourage pedestrian activity**.**
Infrastructure and Public Services Chapter	
Goal 9A: Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities. **Goal 9B**: A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic, and engineering considerations. **Goal 9C**: Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses. **Goal 9D**: An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal. **Goal 9F**: Adequate collection, transfer and disposal of mixed solid waste – the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed of in a manner that minimizes adverse environmental impacts. **Goal 9L**: Sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation.	**No Conflict.** Although these goals are primarily directed towards the City, a discussion of the project's impacts and consistency with the overarching goals are provided below. As discussed in Subsection 15, Public Services, and Subsection 19, Utilities and Service Systems, the Project would incrementally increase water demand, wastewater generation, solid waste generation, and demand for public services, but would have a less than significant impact on these services and utilities. Therefore, the Project would not conflict with Goals 9A, 9C, 9D, 9F, and 9L and their respective objectives. The Project would support Goal 9B through compliance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which requires the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Thus, Best Management Practices (BMPs) would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. Thus, the Project would reduce the amount of hazardous substances and total amount of flow entering the wastewater system, and would not conflict with Goal 9B.

General Plan Objectives/Policies	Analysis of Project Consistency
Housing Element 2013 – 2021	
GOAL 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs. **Objective 1.1**: Provide an adequate supply of rental and ownership housing to meet current and projected needs.	**No Conflict.** The City of Los Angeles is experiencing a demographic trend of an increasing senior population (65 and older) with a growing demand for more senior housing. [70] The Project would help meet this demand by adding 176 residential dwelling units and guest rooms for seniors to the City, including 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, and 46 Alzheimer's/Dementia Care Housing guest rooms, as well as associated residential amenity and service areas. Accordingly, the Project would be consistent with this applicable goal and objective in the Housing Element.
Objective 2.3: Encourage the location of housing, jobs, and services in mutual proximity. Accommodate a diversity of uses that support the needs of the City's existing and future residents. **Policy 2.3.1:** Encourage and plan for high-intensity residential and commercial development in centers, districts, and along transit corridors, as designated in the Community Plans and the Transportation Element of the General Plan, and provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled in order to mitigate traffic congestion, air pollution, and urban sprawl. **Policy 2.3.3:** Encourage the development of new Projects that are accessible to public transportation and services consistent with the community plans.	**No Conflict.** The Project will provide 176 new high-quality eldercare dwelling units and guest rooms that will include independent living units, assisted living units, and memory care units, thereby directly providing a diverse range of new housing opportunities for the City's elderly residents. The Project will provide these new housing opportunities for seniors in direct proximity to Wilshire Boulevard's diverse commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro's Rapid and local bus lines in the vicinity of the Project Site, as well as future transit opportunities created by Metro's Purple Line Extension that will soon serve the Westwood community. Moreover, the Project will further contribute to an active pedestrian environment through its landscaping, street tree planting, and other streetscape improvements. Accordingly, the Project will conform with the goals, objectives, and policies of the City's Housing Element.
Mobility Plan 2035	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	**No Conflict.** During construction of the Project, the majority of construction activities would be anticipated to be confined on-site. However, limited construction activities may be needed on adjacent rights-of-way. As part of Project Design Feature PDF-T-1, the Project would prepare and implement a Construction Traffic Management Plan that would reduce construction-related impacts on the surrounding community. The Construction Traffic Management Plan would include safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce congestion to pubic streets.
Policy 2.3: Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The Project would encourage walking by enhancing the Project Site landscaping at ground-level as well as planting new street trees along Wilshire Boulevard.

[70] *Los Angeles Times. 2018. Accessible at: https://www.latimes.com/projects/la-pol-ca-next-california-demographics/*

General Plan Objectives/Policies	Analysis of Project Consistency
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes including goods movement as integral components of the City's transportation system.	**No Conflict.** The Project would support this City policy by providing safe, clearly defined access pathways to the Project for pedestrians, bicyclists, and motorists. In addition, the Project is located in an area well-served by multiple Metro bus lines, as well as bus lines operated by Santa Monica and Culver City that travel along Westwood Boulevard.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No Conflict.** The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new senior residential use located in a highly urbanized area surrounded by a mix of neighborhood-serving commercial uses, residential uses, public amenities including libraries and parks, and entertainment-related uses.
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	**No Conflict.** The Project supports this City policy by locating in an area well-served by public transit. In addition, the Project would encourage pedestrian activity and provide bicycle facilities on the Project Site.
Sources: City of Los Angeles 1999b, 2001b, 2013a, 2016a.	

Table 4-17
Consistency with Westwood Community Plan Policies

Westwood Community Plan Objectives/Policies	Would the Project Conflict?
Land Use Policies and Programs – Residential	
GOAL 1: A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community.	**No Conflict.** The Project's 176 eldercare dwelling units and guest rooms will provide new housing opportunities to seniors in need of housing and associated care, help to meet the diverse housing needs within the Community Plan area, and make new housing opportunities available to the Community Plan's senior population. Furthermore, the development of the Eldercare Facility on the Project Site, coupled with the retention of the Church's Sanctuary and the relocation of the existing preschool, will constitute an appropriate location of new housing as well as community-serving uses in close proximity to Wilshire Boulevard, existing transit infrastructure, and existing nearby high-rise multi-family housing developments, while protecting nearby single-family residential neighborhoods. The Project is therefore consistent with Goal 1 of the Community Plan.
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	**No Conflict.** The Project will result in the removal of one single-family residence, but will create 176 new dwelling units and guest rooms to accommodate the dire need for senior housing units within the Westwood Community Plan area and across the City.
Policy 1-1.2: Protect the quality of residential environment and promote the maintenance and enhancement of the visual and aesthetic environment of the community.	**No Conflict.** The Project will result in the construction of a 12-story senior housing building on a parcel predominantly zoned R-5, and the preservation of the Church's existing preschool in a new two-story building within the Project Site's R-1 zone. Accordingly, the Project will be consistent the existing development patterns in the vicinity of the Project Site while providing new housing and community-serving amenities to the residents of the Westwood Community Plan.

Westwood Community Plan Objectives/Policies	Would the Project Conflict?
Objective 1-2: To coordinate residential density with infrastructure and to reduce vehicular trips and pass-through traffic in single family neighborhoods by developing new multiple family housing in proximity to services and facilities.	**No Conflict.** The Project will develop new multiple-family senior housing units in close proximity to existing transit infrastructure as well as existing neighborhood-serving commercial uses and public services. Moreover, as set forth in Subsection 17, Transportation, the Project will not result in any traffic- or access-related impacts.
Police Protection	
GOAL 7: A community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services. **Policy 7-1.1**: Consult with the Police in the review of development Projects land use changes to determine law enforcement needs and requirements. **Objective 7-2**: Increase the ability to minimize crime and provide adequate security **Policy 7-2.2**: Ensure that landscaping around buildings does not impede visibility and that adequate lighting is provided around buildings	**No Conflict.** Consistent with Goal 7 and applicable objectives and policies, the Project would be located within in proximity to an existing police station (refer to Subsection 15, Public Services). In order to ensure that the project would provide adequate security, and would not impede police protective services, the Project would be reviewed by the City to ensure design guidelines relative to security, semi-public and private spaces, are implemented. As discussed in Subsection 1, Aesthetics, the Project includes the incorporation of on-site lighting. Therefore, the Project would be consistent with applicable objectives and policies of Goal 7.
Fire Protection	
GOAL 8: Protect the community through a comprehensive fire and life safety program. **Policy 8-1.1**: Coordinate the review of significant development Projects and General Plan amendments with the Fire Department to determine the impact on service demands.	**No Conflict.** Consistent with Goal 8 and applicable objectives and policies, the Project would be located in proximity to an existing fire station (refer to Subsection 15, Public Services). Plans would be subject to the approval of the Los Angeles Fire Department (LAFD) for fire and life safety plan review. LAFD would review fire truck access, fire department connection location, and hydrant pressure requirements for the Project. Therefore, the Project would be consistent with applicable objectives and policies of Goal 8.
Transportation	
Objective 15-1: To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure that necessary road access and street improvements are provided to accommodate traffic generated by new development.	**No Conflict.** The analysis of the impacts related to transportation and traffic is based on transportation assessments (Appendix K) prepared for the Project. The studies concluded that the Project would not result in any significant operational impacts at any of the six study intersections under the City's prior transportation impact criteria, and would not result in any VMT impacts under the City's current criteria. Moreover, the Project will be required to comply with the applicable provisions of the West Los Angeles Transportation Improvement and Mitigation Plan regarding payment of any applicable traffic impact assessment fees. Therefore, the Project would be consistent with applicable objectives and policies of Goal 15.
Historic and Cultural Resources	
GOAL 16: Preservation and restoration of cultural resources, neighborhoods and landmarks which have historical and/or cultural significance. **Objective 16-1:** To ensure that the Community's historically significant resources are protected, preserved, and enhanced.	**No Conflict.** As discussed in Subsection 5, Cultural Resources, the Project would retain and maintain the integrity of the Sanctuary and would not result in any direct or indirect impacts to any off-site historic resources. Therefore, the Project would be consistent with applicable objectives and policies of Goal 16.
Source: City of Los Angeles 1999a.	

Table 4-18
Consistency with Wilshire-Westwood Scenic Corridor Specific Plan Policies and Standards

Specific Plan Policies/Standards	Would the Project Conflict?
Section 4.A: No building or structure shall exceed six stories or 75 feet in height without obtaining approval of a Specific Plan Adjustment or Exception, and compliance with Specific Plan Section 4.B.	**No Conflict.** As set forth by the City's Eldercare Ordinance, which was adopted following the adoption of the Specific Plan, the Zoning Administrator may permit an Eldercare Facility to be located in the R5 zone when the facility does not meet the requirements of any specific plan. Accordingly, in connection with the Eldercare Facility Unified Permit requested for the Project, the Applicant has requested a deviation from the Specific Plan's height limit to allow the proposed 12-story/153-foot building. With the approval of the requested entitlements, there would be no conflict.
Section 4.B: For the approval of any Project above six stories or 75 feet in height, in addition to the findings required by Section 11.5.7 of the Municipal Code, the Approval Authority must also make findings that the proposed Project complies with the provisions of this Specific Plan and that any Shadow from the proposed Project will conform with Section 12, Shadow Impact, hereof (see below). Further, the application shall include a Schematic Design Plan showing the relationship of the proposed Project to adjacent development and surrounding properties affected by shadow. In addition to the notification to property owners required in Section 11.5.7 of the Municipal Code, notification shall also be given to all Homeowner's Associations representing property immediately adjacent to the Specific Plan Area, except that condominium owners shall be notified by a notice to the condominium's Homeowner's Association.	**No Conflict**. Although not directly relevant, as the Applicant is not seeking a Specific Plan Adjustment or Exception to allow the proposed Eldercare Facility's height, for informational purposes, and as set forth below, the proposed Eldercare Facility complies with the shadow-related provisions of Section 12 of the Specific Plan, and this compliance is demonstrated by a shade and shadow study provided by the Applicant and included as Appendix C of this SCEA. The Applicant has conducted outreach to adjacent homeowner groups, which will receive notification of all hearings and determinations regarding the Project.
Section 4.C: The Approval Authority shall impose mitigating conditions when it approves or conditionally approves a Project which will reduce the adverse impacts from noise, traffic, excavation and other inconveniences and problems associated with simultaneous multiple construction activities within the Specific Plan Area where such construction activity will be within 1,000 feet of another Project undergoing construction. Such mitigating conditions may include a requirement to delay the effective date of a Specific Plan Exception entitlement for a Project above six stories or 75 feet in height for a period not to exceed six months. If the Approval Authority determines that such impacts cannot be mitigated, it may disapprove the Project.	**No Conflict.** The Project's potential temporary construction impacts have been identified and analyzed in this SCEA pursuant to CEQA. Specifically, through regulatory compliance and implementation of Project design features and mitigation measures, the construction of the Project will not result in any significant adverse impacts relation to noise, traffic, excavation, or any other construction-related activity.
Section 4.D: All Projects shall be reviewed and approved in accordance with the Design Review Board Procedures of Section 16.50 and the Specific Plan Procedures of Section 11.5.7 of the Los Angeles Municipal Code.	**No Conflict.** The Project will undergo design review by the Westwood Design Review Board in accordance with this provision.
Section 5.A: A. Land Use. All buildings, structures, lots or parcels to be used, erected, altered or enlarged shall conform with those uses permitted in the R5 Multiple Dwelling Zone, except that new Hotels and the addition of guest rooms to existing Hotels shall be expressly prohibited.	**No Conflict.** The Project's Eldercare Facility and Sanctuary uses are permitted within the R5 zone. No hotels exist or are proposed at the Project Site.

Specific Plan Policies/Standards	Would the Project Conflict?
Section 5.B. Density. No building shall be erected, or enlarged which exceeds a density of 100 dwelling units per acre of lot area	**No Conflict.** The Specific Plan allows a maximum of 100 dwelling units per acre, which would allow a total of 94 dwelling units for the proposed 41,098 square feet of lot area within the proposed lot to be created by the requested tract map. The Eldercare Facility proposes a total of 53 dwelling units, which complies with this limit. The Specific Plan does not contain any density limit pertaining to guest rooms, and therefore the LAMC's provisions control. In the R5 zone, guest room density is unlimited, and therefore the Eldercare Facility's proposed 123 guest rooms are permitted.
Section 5.C. Floor Area. The Floor Area Ratio of any building shall not exceed eight times the buildable area of the lot.	**No Conflict.** The Specific Plan establishes a maximum FAR of 8:1. The buildable area of the proposed Eldercare Facility lot (i.e., lot area minus required setbacks for a one-story building) is 32,450 square feet, and the Eldercare Facility's total proposed floor area is 176,580 square feet, resulting in a total FAR of up to 5.45:1, which complies with the Specific Plan's limits.
Section 5.D. Building Area Coverage. No portion of any building or structure which is above the fourth story of such building or structure or which is 50 feet above curb level shall be erected, structurally altered or enlarged so as to have a Lot Utilization of more than 50 percent of the lot area.	**No Conflict.** The Eldercare Facility's Lot Utilization above 4 stories/50 feet is approximately 44.2 percent of Lot 2, thereby complying with this standard.
Section 5.E. Demolition of Rental Housing. In its consideration of any tentative tract map or preliminary parcel map for condominium purposes, the Advisory Agency shall impose conditions to mitigate the loss by demotion of rental housing which may be caused by such condominium Project, as authorized by policies or ordinances adopted by the City Council.	**No Conflict.** No rental housing exists at the Project Site or would be demolished, and therefore this standard does not apply to the Project.
Section 6.A: No building or structure shall be erected, structurally altered or enlarged unless the following parking spaces are provided and maintained: At least two and one-half parking spaces for each dwelling unit contained therein regardless of the number of habitable rooms contained in any dwelling unit. Of the Total number of parking spaces required by this section, at least one-half parking space per unit shall be available only to visitors and guests.	**No Conflict.** Pursuant to the requested Eldercare Facility Unified Permit, and as authorized by the Eldercare Ordinance, the Applicant is seeking a determination to utilize the LAMC's Eldercare Facility parking provisions in lieu of the Specific Plan's standards.
Section 6.B. One additional parking space for each Housekeeper unit.	**No Conflict.** No Housekeeper units are proposed; moreover, pursuant to the requested Eldercare Facility Unified Permit, the Applicant is seeking a determination to utilize the LAMC's Eldercare Facility parking provisions in lieu of the Specific Plan's standards.
Section 7: Projects shall be designed in such a manner that vehicular access to the Project and to Project parking shall be from Wilshire Boulevard whenever possible. If access from Wilshire Boulevard is not possible, access may be from another street provided such access is designed in a manner to minimize the impact on streets adjacent to the Project. Prior to issuance of a building permit, access plans for the Project must be approved by the Bureau of Engineering and the Department of Transportation.	**No Conflict.** The Eldercare Facility's primary access is from Wilshire Boulevard. The Childcare Facility's primary access is from Ashton Avenue. which represents a continuation of current access conditions at the Project Site. The Bureau of Engineering and Department of Transportation will review and approve the Project's final driveway and access plans prior to issuance of building permits.

Specific Plan Policies/Standards	Would the Project Conflict?
Section 8: The façade of an any parking building or that portion of a building or structure which is used for parking, shall be designed in a manner so as to substantially screen automobiles contained therein from the public view, as seen from a public street or alley. The Facade of any parking building shall be designed so that it is similar in color, material and architectural detail with the building for which it serves as required parking. All floors and ramps within a parking structure or floors and ramps within that portion of a building or structure which is used for parking shall have a rough or brush surface so as to reduce automobile tire noise. Parking buildings shall not exceed two stories in height and shall be landscaped in accordance with Section 10 herein.	**No Conflict.** No parking building or structure is proposed as part of the Project; parking will be predominantly provided in a three-level subterranean garage, with several at-grade spaces located in front of the Childcare Facility to facilitate student pick-up and drop-off.
Section 9: Construction fences required by the Los Angeles Municipal Code shall be painted in a single subdued color tone.	**No Conflict.** The Project will comply with this standard.
Section 10: No building or structure shall be erected, structurally altered or enlarged unless shade-producing street trees are planted and maintained in the adjacent public way at a ratio of one tree for every 30 feet of lot frontage to the satisfaction of the Street Tree Division, Bureau of Street Maintenance, Department of Public Works. Such division shall designate planting locations and the species of tree selection. The street maintenance fee set forth in Section 62.176 of the Municipal code shall be required. Such trees should have the following characteristics: (a) Broad branching form that provides, at maturity, a canopy of shade over the sidewalk of not less than 15 feet; (b) No less than 48-inch box size at the time of installation. All tree planting locations shall be equipped with an irrigation system.	**No Conflict.** The landscape plans submitted with the Project's entitlement application demonstrate compliance with this standard; three street trees will be provided along Wilshire Boulevard, which represents the maximum number of trees that may be placed, given tree spacing requirements of the City's Urban Forestry Division. A fourth street tree will be planted elsewhere, which is allowed and consistent with Urban Forestry Division policies.
Section 11: All Projects shall have at least 30 percent of all ground level Open Space planted with shrubs, trees and ground cover. All landscaping shall be identified on a plan prepared by a licensed architect or landscape architect. A. Ground level landscaped Open Space should demonstrate that: 1. special consideration has been given to major entrances to the Project; 2. special consideration has been given to pedestrian views of the Project, demonstrating that the landscaping provides a transition between building scale and human scale; and 3. along all building exterior walls which abut the public street, landscaping serves to truncate the view of the building by continuous planting or selective grouping of trees. Landscaping shall include trees 50 feet high at maturity and no less than 54-inch box size at the time of installation to visually reduce the scale of high-rise structures. B. Any flat roof area within the lowest ten stories of a	**No Conflict.** The submitted landscape plans demonstrate compliance with these standards. The Project does not include flat roofs within the lowest 10 stories of the Eldercare Facility.

Specific Plan Policies/Standards	Would the Project Conflict?
building shall be landscaped as follows: 1. Trees and/or cascading plant material shall be placed along all roof perimeters at a maximum of 30 feet apart. 2. Trees shall be placed at a minimum of one 3-foot box specimen tree for each ten-car spaces occupying each roof parking area. C. All landscaped areas shall be equipped with automatic watering facilities and shall be maintained in a first-class condition at all times.	
Section 12: In considering a proposed Project over six stories or 75 feet in height, as specified in Section 4 B of this Specific Plan, the Approval Authority shall make every effort to minimize the Shadows caused by the Project on residential lots adjacent to the Wilshire-Westwood Scenic Corridor and to maximize air and light between buildings. Toward this end, the criteria to be specifically considered shall be the degree to which a proposed Project shall maximize the access to sunlight and air and minimize Shadows cast onto residential lots lying adjacent to the Scenic Corridor. Such Shadow effects from proposed Projects shall be examined and limited by the Approval Authority, as follows: A. No building on any lot shall be wider than 75 feet as measured in an east/west direction. However, if the effects of a Project fronting on Wilshire Boulevard are examined with respect to Shadow impacts on property that is more than 200 feet distant, and are found to have less impact than such 75-foot-wide building, the Approval Authority may approve such Project. B. North side of Wilshire Boulevard. No Shadow from a Project shall fall upon a residential structure more than 200 feet distant from the north property line, as measured in a northerly direction, for more than two hours between the hours of 9 a.m. and 3 p.m. C. South side of Wilshire Boulevard. No Shadow from a Project shall fall upon a residential structure more than 200 feet distant from the south property line, as measured in a southerly direction, and in an easterly direction for Projects located between Westholme and Holmby Avenues, for more than two hours between the hours of 9 a.m. and 3 p.m	**No Conflict.** The Eldercare Facility measures a maximum of 100 feet, 8 inches wide at its widest point in an east-west direction. However, as demonstrated by the shade and shadow study prepared by the Applicant and included as Appendix C of this SCEA, no shadow cast by the Eldercare Facility building would fall upon a residential structure located more than 200 feet distant of the north or south property line for more than 2 hours between the hours of 9am and 3pm. In addition, a 75-foot wide single structure containing the same development components (floor area and density) as the proposed project would be approximately 184 feet, 6 inches in height or approximately 31 feet, 6 inches taller than the proposed Project. Due to this increased height, such a 75-foot wide building would have a greater potential to result in shadow impacts upon residential properties located more than 200 feet to the north.
Section 13: If any Project will require that import or export of more than 1,000 cubic yards of earth materials, the Approval Authority shall request the Superintendent of Building and the General Manager of the Department of Transportation to investigate the circumstances of the proposed import and/or export and the effects thereof upon the public health, safety and welfare, and report to the Approval Authority. The Approval Authority shall impose conditions on an approval to mitigate any detrimental effects of the hauling operations necessary to the import and/or export of earth as provided in Section 17.13 of the Los Angeles Municipal Code.	**No Conflict.** The Project proposes the export of approximately 62,000 cubic yards of earth materials, and the Applicant has requested a haul route approval pursuant to LAMC Section 17.13 in conjunction with the requested vesting tentative tract map.

Specific Plan Policies/Standards	Would the Project Conflict?
Section 14: The use of public sidewalks and streets in the Specific Plan Area by vendors to engage in selling goods, wares, or merchandise is prohibited.	**No Conflict.** No such use is proposed; the Project will comply with this standard.
Source: City of Los Angeles 2005.	

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to land use and planning. This includes Mitigation Measure LU-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. As described in the impact analysis above, the Project would not conflict with the 2016 SCAG RTP/SCS, LAMC, Westwood Community Plan, Wilshire-Westwood Scenic Corridor Specific Plan, or the City of Los Angeles General Plan. Therefore, the measures included in Mitigation Measure LU-1(b) are not applicable to the Project, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

As described in Subsection 11, Land Use and Planning, the Project is consistent with applicable goals, objectives, and policies of applicable plans related to avoiding or mitigating environmental effects, including the General Plan Framework Element, the Community Plan, the LAMC, and the Specific Plan. The approval of requested Project entitlements does not constitute approval for other future Projects and future potential Projects would undergo similar and separate environmental review. Because the approval of the proposed Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Moreover, there are no other related projects in the immediate vicinity of the Project Site that would implicate the same set of land use plans and policies, and therefore there would be no potential cumulative impacts pertaining to land use and planning.

4.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a) Would the project Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact would occur if the Project would result in the loss of availability of a known mineral resource of regional or statewide value. Per the City of Los Angeles' Conservation Element of the General Plan, the Project Site is not currently or has historically been used for extraction of mineral resources, is not classified by the City of Los Angeles as containing significant mineral deposits, nor is it designated for a mineral extraction land use[27]. Per the City's Safety Element of the General Plan, the Project Site is not classified as being in an oil field or oil drilling area. The Project is located a half mile east and 800 feet west of the Sawtelle and Cheviot Oil Fields, respectively, and the closest known oil exploration well is located approximately 0.5 mile northwest of the Project Site.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining mineral resources. These includes Mitigation Measure MIN-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. As described in the impact analysis above, the Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, the measures included in Mitigation Measure MIN-1(b) are not applicable to the Project, and no impact would occur.

b) Would the project Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The Project Site is currently paved and developed, and surrounded by similar residential and commercial uses. The Project would not involve the use, extraction, or exploration of oil or other aggregate mineral resources. The Project Site is not currently or has historically been used for extraction of mineral resources.[71] Although the Project Site is located in a designated "O" Oil Drilling District zone, the Project is located a half mile east and 800 feet west

[71] *Conservation Element of the City of Los Angeles General Plan. 2001a. http://planning.lacity.org/cwd/gnlpln/consvelt.pdf*

of the Sawtelle and Cheviot Oil Fields, respectively, and the closest known oil exploration well is located approximately 0.5 mile northwest of the Project Site. If undocumented abandoned wells or other undocumented wells were to be discovered during excavations, the wells would be abandoned in accordance with DOGGR standards and regulations.

The 2016-2040 RTP/SCS PEIR MMRP contains a mitigation measure that is to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to mineral resources. This includes Mitigation Measure MIN-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on 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 that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. As described in the impact analysis above, the Project would not result in the loss of availability of a locally important mineral resource. Therefore, the measures included in Mitigation Measure MIN-1(b) are not applicable to the Project, and no impact would occur.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and their project sites do not support existing or future mineral extraction. It is unknown whether or not any of the related project sites' contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral resources, it would not contribute to a potential cumulative impact. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.

4.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The following analysis is based primarily on a Noise and Vibration Technical Report prepared by DKA Planning in May 2020 and included as Appendix J of this SCEA. This report includes a discussion of environmental setting, fundamentals of noise and vibration, regulatory framework, methodology, and impact analysis. The thresholds used for determining significance can be found in the Noise and Vibration Technical Report and are also included below.

Construction Noise Thresholds

Based on the City's adopted noise regulations contained in the LAMC and L.A. CEQA Thresholds Guide, the onsite construction noise impact would be considered significant if:

- Construction noise would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way;
- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Construction of the Project would involve activities lasting more than 10 days, and therefore, impacts would be considered significant if ambient noise levels at nearby sensitive uses were increased by 5 dBA or more.

Groundborne Vibration Thresholds

In assessing impacts related to noise and vibration in this section, the City will use Appendix G as the thresholds of significance. There are no adopted City standards or other applicable regulations that would govern the Project's vibration impacts. Accordingly, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual (set forth below in Table 4-19) will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

Table 4-19
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec) [a]
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

[a] Peak particle velocity (PPV) levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.
Source: Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, 2018.

Operational Noise Thresholds

In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.
- Project operations would cause any 5 dBA or greater noise increase

a) Would the project result in the 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 with Mitigation Incorporated. Land uses sensitive to noise may include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The Wilshire Boulevard corridor in Westwood has a high concentration of residences, institutional uses (e.g., churches, schools), and other uses that may be sensitive to temporary or long-term noise. Noise-sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following:

- Single-family residence at 10808 Ashton Avenue, 5 feet east of the Project Site.

- Wilshire Villa Apartments, multi-family residences, 10811 Ashton Avenue; 10 feet east of the Project Site.
- Californian on Wilshire, multi-family residences, 10800 Wilshire Boulevard; 30 feet east of the Project Site.
- Single-family residences on the 10800 block of Wellworth Avenue (north side), 30 feet south of the Project Site.
- Legacy at Westwood, multi-family residences, 10833 Wilshire Boulevard; 140 feet north of the Project Site.

Construction Impacts

On-site Construction Activities

Proposed construction would generate noise during two sequential phases of construction that would cumulatively span approximately 35 months of noise-generating activities:[72]

- Phase I would include demolition of a portion of the Project Site's asphalt surface parking lot and construction of the Childcare Facility, which consists of a pre-school and office campus on the southern portion of the Project Site. This would include 19,703 square feet of office and school floor area in a two-story building along with an outdoor play area at the southwest corner of the property that includes play equipment, sand play surface, and a trike track. This portion of the campus would be built at grade with no excavation or underground structures. Construction equipment and activities would be staged on the northern portion of the Project Site. A total of nine months of noise-generating construction activities would include (note that the sum of the individual phases will not equal nine due to overlapping of some phases):
    - Demolition of asphalt parking lot and grading (3 weeks)[73]
    - Building construction (8.5 months)
    - Minor paving of a small surface-level parking lot (2 months), which would overlap with some of the building construction and architectural coating phases.
    - Application of architectural coatings (3.25 months), which would overlap with some of the building construction and paving phases.
- Phase II would include demolition of the remainder of the asphalt surface parking lot and existing preschool and office uses on the northern portion of the Project Site (the existing church sanctuary would remain). This would include construction of the "Eldercare Facility", a 12-story mixed-use building (containing approximately 176,580 square feet of floor area) with eldercare facilities over a three-level subterranean parking garage. Vehicle access would include a drop-off driveway along Wilshire Boulevard and entry to the underground garage accessible via driveways from Wilshire Boulevard and Ashton Avenue. Construction equipment and activities would be staged on the southern portion of the Project Site. Phase II improvements would begin immediately after completion of Phase I and would include 26 months of noise-generating construction activities (note that the sum of the individual phases will not equal 26 due to overlapping of some phases):

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[72] *Post-constructions/pre-operation activities associated with system testing, system commissioning/punchlist, final inspections, and certificate of occupancy for both phases would primarily be completed within the enclosed building using small hand tools, and would not involve the use of large noise-generating construction equipment or associated noise effects. Therefore, the construction noise modeling does not include these activities.*

[73] *All construction duration estimates are approximate and based on best currently available information.*

- Demolition of buildings and asphalt parking lot (3 weeks)
- Grading (5 months)
- Building construction (21 months)
- Paving of surface-level parking and driveways (2 weeks), which would overlap with some of the building construction and architectural coating phases.
- Application of architectural coatings (2.5 months), which would overlap with some of the building construction and paving phases.

During all construction phases, noise-generating activities would occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. Construction of the Project would require heavy equipment such as excavators, loaders, and other earthmoving vehicles. Smaller equipment such as pump trucks, scissor lifts, generators, and various powered hand tools would also be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Construction of the Project would occur in two sequential phases at opposite ends of the Project Site that impact ambient noise levels at nearby sensitive receptors differently.

Phase I Impacts

During this nine-month construction period, noise would likely peak during the demolition of the asphalt parking lot and single-family home on Ashton Avenue.[74] With the projected use of approximately five pieces of heavy-duty equipment with diesel engines to clear a portion of the Project Site, construction equipment could generate a cumulative noise level of 82 dBA L_{eq} at 50 feet of distance. As shown in Table 4-20, given the proximity of sensitive receptors to the work on Phase I and existing ambient noise levels (i.e., 49.4 dBA L_{eq} at Wellworth Avenue residences, 53.0 dBA L_{eq} at Ashton Avenue residences), ambient noise levels would increase by 21.6 and 22.7 dBA L_{eq}, respectively, at these two off-site receptor locations, while ambient noise levels at the Wilshire Villa apartments would increase by 13.0 dBA L_{eq}.

Table 4-20
Increases in Ambient Noise
Levels During Construction Phase I (Unmitigated)

Receptor Location	Construction Noise (dBA, L_{eq})	Existing Ambient Level (dBA, L_{eq})	New Ambient Level (dBA, L_{eq})	Change (dBA, L_{eq})	Significant?
Wilshire Villa Apartments	67.1	54.3	67.3	13.0	Yes
Ashton Avenue residences	75.7	53.0	75.7	22.7	Yes
Wellworth Avenue residences	71.0	49.4	71.0	21.6	Yes

[74] *Construction noise is driven by the use of equipment with internal combustion engines, often used during earthmoving activities or removal of manmade structures. The demolition of structures and asphalt involves multiple pieces of diesel-fueled construction equipment such as excavators and dozers. Fine grading typically involves smaller and fewer pieces of equipment with internal combustion engines. Erection of structures like the Education Center usually involves some foundation work and the placement of steel columns, beams and bracing that generally involve smaller equipment such as handheld pneumatic tools powered by compressed air.*

Receptor Location	Construction Noise (dBA, L_{eq})	Existing Ambient Level (dBA, L_{eq})	New Ambient Level (dBA, L_{eq})	Change (dBA, L_{eq})	Significant?
Californian on Wilshire apartments	59.2	57.6	61.5	3.9	No
Legacy at Westwood apartments	57.4	72.7	72.8	0.1	No
Source: DKA Planning, 2020.					

Phase II Impacts

During this 26-month construction period, noise would peak during the excavation and mass grading phase, where approximately 62,000 cubic yards of soil would be removed and hauled to off-site facilities.[75] With the projected use of approximately five pieces of heavy-duty equipment with diesel engines to work this portion of the Project Site, construction equipment could generate a cumulative noise level of 82 dBA L_{eq} at 50 feet of distance. As shown in Table 4-21, given the proximity of sensitive receptors to the work on Phase II and existing ambient noise levels (i.e., 54.3 dBA L_{eq} at Wilshire Villa residences, 57.6 dBA L_{eq} at Californian on Wilshire residences), ambient noise levels would increase substantially more than 5 dBA L_{eq} at all of the off-site receptor locations south of Wilshire Boulevard.

Table 4-21
Increases in Ambient Noise Levels
During Construction Phase II (Unmitigated)

Receptor Location	Construction Noise (dBA, L_{eq})	Existing Ambient Level (dBA, L_{eq})	New Ambient Level (dBA, L_{eq})	Change (dBA, L_{eq})	Signifi-cant?
Wilshire Villa Apartments	75.1	54.3	75.1	20.8	Yes
Ashton Avenue residences	63.8	53.0	64.1	11.1	Yes
Wellworth Avenue residences	56.2	49.4	57.0	7.6	Yes
Californian on Wilshire apartments	72.8	57.6	72.9	15.3	Yes
Legacy at Westwood apartments	66.7	72.7	73.7	1.0	No
Source: DKA Planning, 2020.					

Since on-site construction activities during both Phase I and Phase II would generate noise levels over 5 dBA Leq at off-site receptor locations, this is a potentially significant impact.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to generation of excessive noise during construction. These include Mitigation Measure NOISE-1(b), listed in detail in Section 3.3 of this SCEA, which identifies mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Specifically, Mitigation

[75] *Mass grading typically larger pieces of equipment with internal combustion engines necessary to excavate thousands of cubic yards of soil. The proposed depth of excavation will require several pieces of heavy equipment, such as excavators and graders to export this soil.*

Measure NOISE-1(b) includes the following recommended measures that are relevant to the Project:

- Install temporary noise barriers during construction.
- Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices.
- Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.
- Designate an on-site construction complaint and enforcement manager for the project.
- Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.
- Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.
- Use noise barriers to protect sensitive receptors from excessive noise levels during construction.

Consistent with the above measures, and based upon Project-specific analysis, Project-specific mitigation measures have been identified to reduce construction noise levels. SCAG's listed measures include the use of noise barriers to reduce sound levels emanating from the Project Site. Consistent with this measure, the Project includes Mitigation Measures N-1 and N-4 which includes installation of temporary noise barriers/sound curtains of approximately 8 to 10 feet, depending on the Project Phase, and with a Sound Transmission Class rating of 29 or more.

Mitigation Measures N-1 and N-4 are equal to or more effective than the measures listed under MM-NOISE-1(b) pertaining to noise barriers, as they are site specific and as discussed in the Significance After Mitigation subheading below, would allow construction noise impacts to be reduced a less than significant level.

SCAG's measures also include the proper maintenance and muffling of construction equipment. Consistent with this measure, Project-specific Mitigation Measures N-2, N-5, and N-7 require the construction contractor to maintain equipment in accordance with manufacturer specifications to ensure noise levels are reduced, and to utilize soundproofing exhaust mufflers during both Project Phases. Mitigation Measures N-2, N-5, and N-7 are equal to or more effective than the measures listed under MM-NOISE-1(b), as they are site specific and as discussed in the Significance after Mitigation subheading below, would allow construction noise impacts to be reduced to a less than significant level.

SCAG's measures recommend temporal and locational limitations on construction equipment operation. Consistent with these measures, Project-specific Mitigation Measures N-3 and N-6 limit the number and operating time of construction equipment on-site during both Project Phases. Specifically, Mitigation Measure N-3 requires that during Phase I, no more than five pieces of heavy-duty construction equipment powered by diesel engines would be allowed to operate concurrently and for longer than 45 minutes in an hour. In addition, Mitigation Measure N-6 requires that during Phase II, no more than five pieces of heavy-duty construction equipment powered by diesel engines would be allowed to operate concurrently and for longer than 30 minutes in an hour. Mitigation Measures N-3 and N-6 are equal to or more effective than the measures listed under MM-NOISE-1(b), as they are site specific and as discussed in the Significance after Mitigation subheading below, would allow construction noise impacts to be reduced to a less than significant level.

Mitigation Measures

MM-N-1 During Phase I, a temporary noise barrier and/or sound control curtains shall be installed along the perimeter of the Project Site. The barrier shall have a Sound Transmission Class rating of 29 or more, consist of K-rail with one-inch plywood fencing on top, at least 8 feet in height and not have any gaps or holes between the panels or at the bottom. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code.

MM-N-2 During Phase I, exhaust mufflers shall be used capable of reducing noise down to an average of 65 dBA at a distance of 50 feet on internal combustion engines for heavy-duty construction equipment. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

MM-N-3 During Phase I, no more than five pieces of heavy-duty construction equipment powered by diesel engines shall operate concurrently. On average, such equipment shall be in operation mode no more than 45 minutes in an hour.

MM-N-4 During Phase II, a temporary noise barrier and/or sound control curtains shall be installed along the perimeter of the Project Site. The barrier shall have a Sound Transmission Class rating of 29 or more, consist of K-rail with one-inch plywood

fencing on top, at least ten feet in height and not have any gaps or holes between the panels or at the bottom. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code.

MM-N-5 During Phase II, exhaust mufflers shall be used capable of reducing noise down to an average of 60 dBA at a distance of 50 feet on internal combustion engines for heavy-duty construction equipment. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

MM-N-6 During Phase II, no more than five pieces of heavy-duty construction equipment powered by diesel engines shall operate concurrently. On average, such equipment shall be in operation mode no more than 30 minutes in an hour.

MM-N-7 During both phases, the housing or enclosures for noise-producing construction equipment shall be soundproofed, where feasible.

Significance After Mitigation

Construction noise impacts at nearby sensitive receptors would be substantially reduced with the implementation of Mitigation Measures MM-N-1 through MM-N-7. Proposed mitigation measures would focus on using quieter equipment and barrier protection to reduce exposure of adjacent sensitive receptors to excessive noise. Specifically, MM-N-1 and MM-N-4 require temporary noise barriers to be installed along the perimeter of the Project Site during each phase. The barrier would block the line-of-sight from construction-related noise sources and reduce off-site noise exposure. MM-N-2 and MM-N-5 would focus on control of noise sources, including use of quieter equipment, using advanced exhaust mufflers on internal combustion engines for construction equipment that can reduce noise impacts by up to 25 dBA.[76] Other mitigation measures MM-N-3 and MM-N-6 would control the duty cycle and operating profile of heavy-duty equipment to further mitigation construction noise during each phase. Lastly, MM-N-7 requires the use of housing or enclosures for noise-producing machinery to further minimize off-site noise impacts during each phase.

As shown in Table 4-22, with implementation of the identified Project-specific mitigation measures, ambient noise levels would increase no more than 4.6 dBA Leq during Phase I. These increases would be below the City's 5 dBA Leq threshold of significance. As such, construction noise impacts would be considered less than significant with mitigation.

[76] *United States Department of Labor, Occupational Safety and Health Administration, OSHA Technical Manual, Chapter 5, Table V-6 (Noise-Control Engineering Cost Assumptions)*

Table 4-22
Increases in Ambient Noise Levels
During Construction Phase I (with Mitigation

Receptor Location	Construction Noise (dBA, L_{eq})	Existing Ambient Level (dBA, L_{eq})	New Ambient Level (dBA, L_{eq})	Change (dBA, L_{eq})	Signifi-cant?
Wilshire Villa Apartments	57.1	54.3	58.9	4.6	No
Ashton Avenue residences	53.4	53.0	56.2	3.2	No
Wellworth Avenue residences	49.1	49.4	52.3	2.9	No
Californian on Wilshire apartments	49.7	57.6	58.3	0.7	No
Legacy at Westwood apartments	47.7	72.7	72.7	0.0	No
Source: DKA Planning, 2020.					

As shown in Table 4-23, with implementation of the identified Project-specific mitigation measures, ambient noise levels would increase no more than 4.7 dBA Leq during Phase II. These increases would be below the City's 5 dBA Leq threshold of significance. As such, construction noise impacts would be considered less than significant with mitigation.

Table 4-23
Increases in Ambient Noise Levels
During Construction Phase II (with Mitigation)

Receptor Location	Construction Noise (dBA, L_{eq})	Existing Ambient Level (dBA, L_{eq})	New Ambient Level (dBA, L_{eq})	Change (dBA, L_{eq})	Signifi-cant?
Wilshire Villa Apartments	57.2	54.3	59.0	4.7	No
Ashton Avenue residences	42.2	53.0	53.3	0.3	No
Wellworth Avenue residences	36.9	49.4	49.6	0.2	No
Californian on Wilshire apartments	54.8	57.6	59.4	1.8	No
Legacy at Westwood apartments	48.0	72.7	72.7	0.0	No
Source: DKA Planning, 2020.					

Off-Site Construction Activities

LAMC Section 112.05 does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, operation of these vehicles would still comply with the construction hour restrictions set forth by LAMC Section 41.40. The Project would require approximately 4,430 haul trips to export soils to off-site landfills, assuming a capacity of 14 cubic yards per haul truck. Therefore, approximately 50 loaded truck trips per day would occur over the approximately 93-day excavation period. Haul trucks would exit onto Wilshire Boulevard, head east to South Beverly Glen Boulevard, and turn onto Santa Monica Boulevard, where trucks would merge onto I-405 north to travel to the ultimate destination of Chiquita Canyon Landfill.

A 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.[77] Haul truck trips during the excavation phase would average approximately eight to nine trips per hour over the proposed six-hour daily haul period between 9:00 a.m. and 3:00 p.m. The marginal addition of up to nine haul trucks trips per hour to local arterials would represent the equivalent of about 23 passenger vehicles (based upon a passenger car equivalency [PCE] factor of 2.5 to account for the heavier weight and larger size haul trucks),[78] which would not double traffic volumes on arterials like Wilshire Boulevard and Santa Monica Boulevard. For example, approximately 3,795 vehicles travel east- and westbound on Wilshire Boulevard at Selby Avenue during the afternoon peak hour; therefore, haul truck traffic would represent less than one percent of the existing traffic volume on Wilshire Boulevard (Appendix J). Because the Project's haul route traffic would not result in a doubling of roadway traffic volume and would therefore not increase ambient noise levels by 3 dBA CNEL, the increase in ambient noise levels due to off-site construction noise generated by haul trucks would not exceed the threshold of 5 dBA (Appendix J). As a result, the Project's off-site construction noise impact from haul trucks would be less than significant.

Cumulative Construction Noise

Construction of the Project in combination with the related projects in the vicinity would result in an increase in construction noise in this heavily urbanized area of the city. A list of related projects is provided in the Transportation Impact Study, provided as Appendix K-1 of this SCEA. None of the related Projects are within 1,000 feet of the Project Site. The closest related project is located at 10955 Wilshire Boulevard approximately 1,410 feet west of the Project Site. As noise is a localized phenomenon and decreases in magnitude as distance from the source increases, only projects and ambient growth within 1,000 feet and having a direct line-of-sight to the Project Sites, or those that generate traffic on study roads, could combine with the Project to result in cumulatively considerable noise impacts (Appendix J). Due to the distance and intervening structures between the 10955 Wilshire Boulevard project would not substantially contribute to cumulative noise impacts with the proposed Project. Furthermore, construction of all related projects and other unforeseen projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the related projects would be subject to LAMC Section 112.05, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Given the distance of related projects and compliance with existing noise regulations, cumulative impacts with respect to construction noise would be less than significant.

On-site Operational Noise

During operation, the Project would produce noise from both on- and off-site sources, including HVAC equipment, on-site parking lot activities, eldercare facility use, and childcare facility use. Each of these noise sources and its potential impacts are discussed below.

HVAC Equipment

Operational noise impacts would be considered significant if:

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[77] *Federal Highway Administration, Highway Traffic Noise Analysis and Abatement Policy and Guidance, accessed at https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm*

[78] *See Construction Traffic Analysis Memo, Appendix K-2, p. 3.*

- Project operations would cause any 5 dBA (L_{eq})or greater noise increase.

HVAC equipment would be located on building rooftops, where equipment generates a sound pressure level of up to 95 dBA at one foot. The roof edge would create a natural noise barrier that would reduce noise levels from rooftop HVAC units by at least 8 dBA. This reduction is helpful in managing noise because HVAC equipment often operates continuously throughout the day, evening, and night. HVAC equipment noise would be further reduced by implementation of PDF-N-1, which includes installation of a rooftop enclosure for HVAC equipment. As shown in Table 4-24, with attenuation from the roof edge and the proposed rooftop enclosure, HVAC equipment placed at the edges of the roofs of proposed buildings would increase ambient noise levels at nearby receivers by no more than 3.9 dBA and would be below the significance threshold of 5 dBA. Regulatory compliance with LAMC Section 112.02 would further ensure that noises from sources such as HVAC equipment would not increase ambient noise levels at neighboring occupied properties by more than 5 dBA.

Table 4-24
Estimated HVAC Operational Noise Levels

Receiver Location	Existing Ambient Noise Level (dBA L_{eq})	Operational Noise (dBA L_{eq})	Existing plus Project Ambient Noise Level (dBA L_{eq})	Change in Ambient Noise Level (dBA L_{eq})
Wilshire Villa Apartments	54.3	51.5	56.1	1.8
Ashton Avenue Residences	53.0	54.6	56.9	3.9
Wellworth Avenue Residences	49.4	42.0	50.1	0.7
Californian on Wilshire Apartments	57.6	42.0	57.7	0.1
Legacy at Westwood Apartments	72.7	28.6	72.7	0.0
Source: Noise and Vibration Technical Report May 2019; Appendix J				

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to generation of excessive noise during operation. These include Mitigation Measure NOISE-1(b), listed in detail in Section 3.3 of this SCEA, which identifies mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Specifically, Mitigation Measure NOISE-1(b) includes the following recommended measures that are relevant to the Project:

- Include permanent noise barriers and sound-attenuating features as part of the project design.

Consistent with the above measures and in accordance with regulatory compliance with LAMC Section 112.02, the Project includes the implementation of PDF-N-1, as described below, which would reduce operational noise from the on-site HVAC equipment. This barrier is equal to or more effective than the measures listed under MM-NOISE-1(b), as it is site specific and would ensure residual operational noise does not exceed established thresholds. Therefore, impacts related to HVAC equipment would be less than significant.

Project Design Feature

PDF-N-1 **Noise Shielding for Rooftop Equipment.** Rooftop HVAC equipment shall be enclosed with absorptive materials that block any line-of-sight transmission of noise to adjacent properties. Pipes and duct work shall also be wrapped or treated to block transmission of sound.

Auto-Related Activities

The Project would include a multi-level subterranean parking structure that would accommodate the majority of the Project's parking spaces as well as a small at-grade parking area near the Childcare Facility. Vehicles would enter the Project Site from either Wilshire Boulevard or Ashton Avenue and enter the parking garage, which faces to the east approximately 40 feet from the eastern property line and 70 feet from the Californian on Wilshire apartments. Noise levels associated with vehicular activity in the subterranean parking garage (e.g., tire squeal and slamming vehicle doors) would be contained within the parking structure because the subterranean parking levels would be fully enclosed on all sides. As shown in Table 4-25**,** auto-related noise from the parking garage would increase ambient noise levels by less than 1 dBA at the nearest receivers to the east, which would be below the significance threshold of 5 dBA. Therefore, noise impacts from underground parking garage operations would be less than significant.

Table 4-25
Noise Impacts from Parking
Garage-Related Activities at Nearest Receivers

Noise Monitoring Locations	Sound Levels (dBA L_{eq})
Existing Ambient	57.6
Impact from Parking Activities	49.4
Future Ambient	58.0
Difference	0.4
Significant?	No
Source: Noise and Vibration Technical Report May 2019; Appendix J	

In addition to the subterranean parking garage, three conventional and two accessible surface parking spaces would be included along the north side of the Childcare Facility. While these spaces would generate intermittent auto-related noise from visitors or employees, a net reduction in noise impacts from on-site surface parking activities would occur because nearly 60 conventional and tandem surface parking spaces currently exist in the same general location. As a result, the Project would reduce surface parking lot noise impacts at the Wilshire Villa Apartments, the closest sensitive receiver, which has a direct line of sight to these parking spaces. Therefore, because there would be a net reduction in noise associated with on-site parking, impacts would be less than significant.

Eldercare Facility Uses

Noise generated by residents of the Eldercare Facility would be contained internally in the Project. Some activities would occur outside on the roof deck, such as passive activities like socializing.

The Lombard effect[79] results in voice noise levels in face-to-face conversations that generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.[80] Assuming an ambient noise level of approximately 54.3 dBA L_{eq} based on measurements at the nearby Wilshire Villa Apartments, human conversations from rooftop activities on-site could generate noise levels of about 67 dBA at one meter. The attenuation from the built environment would virtually eliminate any exposure to elevated noise levels at the nearest sensitive receivers. The combination of the roof edges and safety barriers would block any light of-sight from residents and staff conversing on the rooftop. As a result, the increase in ambient noise levels at nearby receivers would be up to 0.3 dBA L_{eq}, a negligible increase in noise that would be inaudible to the human ear and below the 5 dBA threshold of significance. Similarly, any outdoor recreation by residents and staff would produce incremental noise levels that would be attenuated by the distance to nearby receivers. These noises attenuate rapidly and would not be capable of elevating surrounding ambient noise levels by more than a nominal degree.

Childcare Facility

The Childcare Facility would include a replacement outdoor play area for preschool students. While administrative and educational activities inside the building would be contained internally, outdoor play at the southwestern corner of the Project Site would generate intermittent noise. The Project would not change the duration or nature of outdoor play activities at the existing preschool at the Project Site, which occur two to three times daily from 9:00 a.m. to 11:30 a.m., 12:30 p.m. to 2:00 p.m., and 2:15 p.m. to 4:30 p.m. Furthermore, while the Project would result in an increased school enrollment of 25 children, the additional children would be infants and toddlers, who would spend less time outdoors than the older preschool students, whose enrollment would remain consistent at 85 children. Consistent with existing operations, children would play up to three times per day in a play area that includes a trike track, sand play pit, and age-appropriate play equipment that would not generate any mechanical noise itself. Pursuant to PDF-N-2, no amplified music or public address system would be utilized for preschool operations.

With development of the proposed Childcare Facility noise from outdoor play activities associated with the existing preschool would be shifted approximately 180 feet south of the current facility. Shifting the play area to the south would bring it closer to residences along Wellworth Avenue; however, the play area would be located five feet and more above the ground level of the adjacent residences, and as a result, there is no direct line-of-sight from the play area to these residences. Implementation of Project design feature PDF-N-3 would include installation of a minimum five-foot-high masonry wall and landscaping along the southern property line of the Project Site, which would further block the line-of-sight from the play area to adjacent residences. The combination of the wall and the terrain would attenuate noise resulting from the outdoor play area.

The play area would produce a sound level of approximately 13.1 dBA L_{eq} at the adjacent residences along Wellworth Avenue. The current ambient noise level at these residences is approximately 49.4 dBA L_{eq}.. The very low sound levels generated by the play area, coupled with the grade differential and the introduction of landscaping and five-foot-high masonry wall blocking the line of sight between the play area and nearby residences, operation of the play area would

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[79] *The Lombard effect is a phenomenon in which speakers increase their vocal levels in the presence of a background noise.*

[80] *Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.*

result in a 0.0 dBA L_{eq} increase to the existing 49.4 dBA L_{eq} ambient noise level. As a result, net noise impacts would not cause ambient noise levels at off-site locations to increase by 5 dBA L_{eq} or greater.

The Project would also include a smaller play area north of the proposed Childcare Facility that would consist of a mound slide, sandbox, and shade structure for storytelling. This area would be enclosed by a six-foot high concrete masonry unit wall that would both protect children and shield and attenuate noise impacts at adjacent land uses. This play area would be small and similar in location to the existing play area, resulting in no net change in operational noise from church preschool, which currently does not generate significant noise as demonstrated by the ambient noise measurements.[81] Therefore, the operational noise impacts for outdoor play activities at the Childcare Facility would be considered less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to generation of excessive noise during operation. These include Mitigation Measure NOISE-1(b), listed in detail in Section 3.3 of this SCEA, which identifies mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Specifically, Mitigation Measure NOISE-1(b) includes the following recommended measures that are relevant to the Project:

- Include permanent noise barriers and sound-attenuating features as part of the project design.

Consistent with the above measures and in accordance with regulatory compliance, the Project includes the implementation of Project Design Features PDF-N-2 *Amplified Sound,* PDF-N-3 *Masonry Wall and Landscaping,* and PDF-N-4 *Power During Construction,* as described below, which would further reduce operational noise from the Childcare Facility. These features are equal to or more effective than the measures listed under MM-NOISE-1(b), as they are site specific and would ensure residual operational noise emanating from the Childcare Facility does not exceed established thresholds. Therefore, impacts related to operational noise from the Childcare Facility would be less than significant.

Project Design Features

PDF-N-2 **Amplified Sound.** No amplified music or public address system is to be utilized for the proposed preschool operations

PDF-N-3 **Masonry Wall and Landscaping.** A masonry wall and landscaping shall be installed along the southern property line of the Project Site. The masonry wall shall be at least five feet in height and block the line-of-sight between the proposed Childcare Facility and the existing homes on Wellworth Avenue.

PDF-N-4 **Power During Construction.** Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators shall be used during construction.

[81] *The preschool activities already exist on the Project Site and have not been the subject of noise violations or neighborhood complaints.*

Cumulative Operational Noise

Operation of the Project in combination with the related projects could result in an increase in operational noise and vibration in this urbanized area of the city. Operational noise from related projects could potentially combine with that generated by the proposed Project. However, all of the related projects are over 1,400 feet away from the Project Site and would be subject to the LAMC and potential project-specific mitigation related to the generation of on-site noise sources associated with mechanical equipment, parking, and outdoor spaces.

As previously discussed, operational noise impacts would be less than significant for the Project, and on-site cumulative noise levels associated with the related projects would be regulated by the LAMC and associated project mitigation, as needed. For this reason and because the Project would not contribute to operational noise at the sites of other planned and pending developments, cumulative on-site operational noise impacts would be less than significant.

Off-Site Mobile Noise Sources

Future Plus Project

The Project would generate net new vehicle trips and incrementally increase traffic on area roadways. On a typical weekday, the Project would generate an estimated 732 net new daily trips, including 41 net new AM peak hour trips and 49 net new PM peak hour trips (Appendix K-1). According to the FHWA, a 3 dBA increase in roadway noise levels requires a doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant.[82]

As shown in Table 4-26, under existing (2019) plus Project conditions, Project-related traffic would increase 24-hour ambient CNEL noise levels on nearby roadways by less than 0.1 dBA and would therefore would not increase ambient noise levels by more than 3 dBA CNEL to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines. Therefore, Project-level off-site operational roadway noise impacts would be less than significant.

Table 4-26
Existing plus Project Roadway Noise Impacts

Roadway Segment	Estimated Noise Level (dBA CNEL)			
	Existing (2019)	Existing plus Project (2019)	Change	Significant Impact?
Westwood Bl. N of Santa Monica Bl.	61.9	61.9	< 0.1	No
Wilshire Blvd. E of Westwood Blvd.	65.0	65.0	< 0.1	No
Wilshire Blvd. W of Westholme Ave.	64.2	64.2	< 0.1	No
Source: Noise and Vibration Technical Report May 2019; Appendix J				

Cumulative development in the Project Site vicinity as well as overall ambient traffic growth would increase future ambient noise levels on surrounding local roadways. As shown in Table 4-27, the study roadway segments would experience cumulative noise increases of up to 0.1 dBA CNEL, which is below the minimum 3 dBA CNEL noise increase threshold to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the

[82] *Federal Highway Administration, Highway Traffic Noise Analysis and Abatement Policy and Guidance, accessed at https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm*

State's 2017 General Plan Guidelines. As a result, cumulative off-site operational noise impacts would be less than significant. Furthermore, noise generated by Project-related traffic would contribute less than 0.1 dBA to the cumulative increase in ambient noise levels. As such, the Project's contribution to permanent cumulative off-site ambient noise level increases would be less than significant.

Table 4-27
Cumulative plus Project Roadway Noise Impacts

Roadway Segment	Estimated Noise Level (dBA CNEL)					
	Existing (2019)	Cumulative (2025)	Cumulative plus Project (2025)	Cumulative Change	Project Contribution	Significant Impact?
Westwood Blvd. N of Santa Monica Blvd.	61.9	62.2	62.2	0.3	< 0.1	No
Wilshire Blvd. E of Westwood Blvd.	65.2	65.2	65.2	0.2	< 0.1	No
Wilshire Blvd. W of Westholme Ave.	64.4	64.4	64.4	0.2	< 0.1	No
Source: Noise and Vibration Technical Report May 2019; Appendix J						

b) Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. This analysis discusses vibration in terms of peak particle velocity (PPV), which is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[83] Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inch per second. Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. No sources of groundborne vibration were perceptible at any noise measurement locations (Appendix J). As such, groundborne vibration levels surrounding the Project Site are generally imperceptible, suggesting that groundborne vibration levels are typically below the 0.01 inch per second threshold of perception for humans.

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used in the absence of federal, County, and City standards specific to temporary construction activities. The 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.

Construction Impacts

Construction vibration impacts were analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at on-site and nearby buildings, based on principles and guidelines recommended by the FTA in its 2018 *Transit Noise and*

[83] *Federal Transit Administration. 2018 Transit Noise and Vibration Impact Assessment Manual. Accessible at: 2018 Transit Noise and Vibration Impact Assessment Manual. Accessed June 2020.*

Vibration Impact Assessment Manual. Vibration levels were then compared with the manual's suggested damage criteria for various types of building categories.

In addition to the noise-sensitive residential receptors noted earlier, the Pierce Brothers Westwood Village Memorial Park and Mortuary, located at 1218 Glendon Avenue, abuts the western property line of the Project Site. The grounds include mausoleums that are built up to the property line and share 220 feet of the western property line of the Project Site.

On-Site Sources

Project construction would require large steel-tracked earthmoving equipment such as excavators. Although these vehicles may be capable of generating maximum vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet, it is important to note that these vehicles would not be capable of operating directly where the Project Site's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability in addition to operating at reduced power and intensity to maintain precision at these locations. As a result, vibration levels of 0.089 inches per second PPV, which are representative of maximum peak operations, would not be generated at the property lines of the proposed Project.

As shown in Table 4-28, anticipated vibration levels could exceed thresholds for specific building types. Heavy earthmoving equipment may produce potentially damaging levels of groundborne vibration at the closest vibration-sensitive receivers. For example, newer engineered buildings like the Californian on Wilshire and the iPic Movie Theater were built under current protective seismic and structural standards that will resist any movement from construction-related vibration. On the other hand, some older structures could experience groundborne vibrations in excess of FTA's recommended 0.12 inches per second PPV damage criteria for buildings that are extremely susceptible to vibration damage (such as historic buildings). This includes the Pierce Brothers Westwood Village Memorial Park and Mortuary, which is a City-designated historic resource, and which abut the westerly property line of the Project Site. The potential vibration velocity of 0.352 inches per second PPV would result in a vibration potential above FTA's recommended 0.12 inches per second PPV, resulting in a potentially significant impact prior to implementation of mitigation.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to generation of excessive noise during construction. These include Mitigation Measure NOISE-2(b), listed in detail in Section 3.3 of this SCEA, which identifies mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Specifically, Mitigation Measure NOISE-2(b) includes the following recommended measures that are relevant to the Project:

- For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.

- For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.
- For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.

Although the Project would not include blasting or pile driving activities, the Project would be consistent with the above measures, as the Project includes Project-level mitigation measures to reduce vibration noise and ensure that historic buildings on and adjacent to the Project Site are not damaged during construction. SCAG's listed measures recommend determining threshold levels of vibration that could damage adjacent structures, and designing construction methods to not exceed the thresholds. Consistent with SCAG's measure, the Project includes Mitigation Measures N-8 through N-10 which would ensure that construction activities that produce vibration are sequenced, pre-construction surveys are conducted, and that any potentially significant building damage is mitigated and addressed in real time through vibration monitoring techniques. These measures are equal to or more effective than the measures listed under MM-NOISE-2(b), as they are site specific and reflect quantitative analysis of the Project construction equipment to be used and the resulting potential for vibration-related damage. As shown below, implementation of these Project-specific mitigation measures, would reduce vibration noise impacts to a less than significant level.

Mitigation Measures

MM-N-8 Construction activities that produce vibration, such as demolition, excavation, and earthmoving, shall be sequenced so that vibration sources within 100 feet of the mortuary structures at Pierce Brothers Westwood Village Memorial Park and Mortuary do not operate simultaneously.

MM-N-9 Pre-construction surveys shall be performed to document the conditions at the boundary of the mortuary at Pierce Brothers Westwood Village Memorial Park and Mortuary. A structural monitoring program shall be implemented and recorded during construction to ensure that groundborne vibration levels at the boundary of the Project Site adjacent to the mortuary do not exceed 0.12 inches per second peak particle velocity (PPV). The performance standards of the structure monitoring plan shall include the following:

- Documentation, consisting of video and/or photographic documentation of accessible and visible areas on the exterior of the building.
- Prior to the start of construction, the Applicant shall retain the services of a structural engineer to visit the Pierce Brothers Westwood Village Memorial Park and Mortuary to inspect and document the apparent physical condition of the building's readily-visible features, including but not limited to the building structure. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare the shoring design.
- The Applicant shall retain the services of a qualified acoustical engineer to review the proposed construction equipment and develop and implement a

vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project's western property line adjacent to the Pierce Brothers Westwood Village Memorial Park and Mortuary during the Project's demolition and excavation phases during which heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 15 feet of the affected buildings.

- The vibration monitoring system shall measure and continuously store the PPV in inches per second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.07 inch per second (PPV) and a regulatory level of 0.12 inch per second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels.
- In the event that the warning level of 0.07 inch per second (PPV) is triggered, the contractor shall identify the source of vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.
- In the event that the regulatory level of 0.12 inch per second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the Pierce Brothers Westwood Village Memorial Park and Mortuary and visually inspect the building for any damage. Results of the inspection shall be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.07 inch per second (PPV). Construction activities may then restart.
- In the event that damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.
- The structure-monitoring program shall be submitted to the Department of Building and Safety and received into the case file for the associated discretionary action permitting the Project prior to initiating any construction activities.

MM-N-10 Construction activities shall utilize rubber-tired equipment in place of steel-track equipment whenever feasible.

As required by these mitigation measures, smaller, more maneuverable and precise equipment and techniques capable of fine grading at property lines would be utilized, and would only generate maximum vibration levels of 0.003 inches per second PPV. Table 4-28 shows the estimated construction vibration impacts resulting from these smaller pieces of equipment at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration as a result of these Project construction activities, and more distant structures would experience lesser impacts. Therefore, on-site construction vibration impacts would be less than significant.

Table 4-28
Construction Vibration Levels

Building	Distance (feet) [1]	Condition[2]	Significance Criteria (in/sec)[2]	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact Prior to Mitigation?
Large Dozer-Type Equipment					
Pierce Brothers Westwood Village Memorial Park and Mortuary	10	IV. Buildings extremely susceptible to vibration damage	0.12	0.352	Yes
Single-family residence at 10808 Ashton Avenue	15	III. Non-engineered timber and masonry buildings	0.2	0.191	No
Wilshire Villa Apartments, 10811 Ashton Avenue	20	I. Reinforced concrete, steel or timber (no plaster)	0.5	0.089	No
Californian on Wilshire, 10800 Wilshire Boulevard	40	I. Reinforced concrete, steel or timber (no plaster)	0.5	0.044	No
Single-family residences, 10800 block of Wellworth Avenue (north side)	40	III. Non-engineered timber and masonry buildings	0.2	0.044	No
iPic Movie Theater, 10840 Wilshire Boulevard	10	I. Reinforced concrete, steel, or timber (no plaster)	0.5	0.352	No
Small Dozer-Type Equipment (Required To Avoid Exceeding Maximum Allowable Vibration Levels)					
Pierce Brothers Westwood Village Memorial Park and Mortuary	10	IV. Buildings extremely susceptible to vibration damage	0.12	0.012	No
Single-family residence at 10808 Ashton Avenue	15	III. Non-engineered timber and masonry buildings	0.2	0.006	No
Wilshire Villa Apartments, 10811 Ashton Avenue	20	I. Reinforced concrete, steel or timber (no plaster)	0.5	0.004	No
Californian on Wilshire, 10800 Wilshire Boulevard	40	I. Reinforced concrete, steel or timber (no plaster)	0.5	0.001	No
Single-family residences, 10800 block of Wellworth Avenue (north side)	40	III. Non-engineered timber and masonry buildings	0.2	0.001	No
iPic Movie Theater, 10840 Wilshire Boulevard	10	I. Reinforced concrete, steel, or timber (no plaster)	0.5	0.006	No

[1] Includes ten feet from property line to accommodate equipment maneuverability.

[2] Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual.

Source: Appendix J

Off-Site Sources

As discussed earlier, Project construction would generate trips from large trucks, including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks.

Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[84] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated haul route that are situated approximately 25 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. As such, the Project would not result in the potential to damage roadside buildings and structures as the result of groundborne vibrations generated by truck trips and this impact would be less than significant.

Operational Impacts

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project proposes 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, and 46 Alzheimer's/Dementia Care Housing guest rooms, as well as associated residential amenity and service areas along with the Education Center (consisting of preschool and church administrative offices), none of which would generate operational vibration. The Project would be accessed mostly by passenger vehicles that would not be capable of generating substantial groundborne vibrations. Therefore, the Project's long-term vibration impact from operational sources would be nominal and less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The related project closest to the Project Site is located over 1,400 feet away, far beyond the potential to contribute to cumulative vibration impacts due to the rapid attenuation of vibration effects. As such, the maximum vibration level from construction and operational activities on any related project sites would not result in a cumulatively considerable vibration impact at the nearest sensitive receptors.

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[84] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.*

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

No Impact. The closest public airport to the Project Site is Santa Monica Airport, which is approximately 2.9 miles southwest of the Project Site. The Project Site is not located within an airport influence area or an airport runway protection zone.[85]

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to be located within an airport land use plan where residents or workers would be exposed to excessive public or private aviation related noise. Therefore, no mitigation measures are applicable. The Project would have no impact related to the exposure of people residing or working in the Project area to excessive noise levels.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

As discussed throughout Subsection 13, Noise, cumulative impacts during both construction and operation have been quantitatively analyzed, and no cumulatively considerable Project impacts have been identified. Given the distance of all related projects and compliance with existing noise regulations, cumulative impacts with respect to construction noise would be less than significant. On-site cumulative noise levels associated with the related projects would be regulated by the LAMC and associated Project mitigation and project design features, as needed. As discussed, cumulative on-site operational noise impacts would be less than significant.

[85] *County of Los Angeles A-Net GIS Interactive Map. Accessible at: http://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a. Accessed June 2020.*

4.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project involves the construction of a new Eldercare Facility that would include 123 single-occupancy assisted living and dementia care guest rooms, 40 two-bedroom independent living apartments, and 13 one-bedroom independent living apartments. Although the facility is primarily expected to draw residents from the current population, it could cause a direct increase in the City's population by introducing new residents to the Project Site. According to data provided by the California Department of Finance (DOF), the estimated 2020 population of the City is 4,010,684 persons.[86] Given the occupancy limits of the assisted living/dementia care units and an average household size of 2.42 persons per household for the City of Los Angeles (applied to the independent living units), the Project would house an estimated 252 residents (123 + [53 x 2.42]).[87] The estimate of potential future residents is conservative because the 53 residential units would likely be occupied by fewer than 2.42 persons per unit given their nature as senior living units.

The Project may also cause an indirect increase in the City's population by providing new employment opportunities, which may result in the relocation of employees to the City. A total of 55 employees are anticipated to be on-site at the assisted living and residential care facility during the largest shift. Assuming conservatively that there are three eight-hour shifts and that 55 employees work each shift, the assisted living and residential care facility would employ approximately 165 people. In addition, the relocated and expanded Childcare Facility would require an additional seven staff members over the preschool's current staffing levels of 14 full time staff and four part time employees. Therefore, the Project is estimated to employ approximately 172 additional people. The construction of the replacement Church offices would not result in a net increase in employment because it would be a relocation and replacement of

[86] *California Department of Finance. 2018. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark. January 2018. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (accessed April 2018).*

[87] *Based on a 2.42 persons per household rate for multi-family units based on the 2017 American Community Survey 5-Year Average Estimate (2013–2017) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, March 8, 2018.*

the existing Church offices to be demolished. Assuming conservatively that all residents and employees relocate from outside the City of Los Angeles, the Project would result in 252 new residents and 172 new employees.

SCAG's 2016-2020 RTP/SCS forecasts that the population of the City will increase to approximately 4,200,168 persons by year 2025 (year of Project buildout), which is an increase of 189,484 persons from the current population.[88,89] The addition of 252 residents in the Project area would constitute approximately 0.13 percent of the City's total projected population growth through year 2025. SCAG forecasts that the population of the City will increase to approximately 4,609,400 persons by year 2040, which is an increase of 598,716 persons from the current population.[90] The addition of 252 residents in the Project area would constitute 0.04 percent of the City's total projected population growth through year 2040. Therefore, the level of population growth associated with the proposed Project would not exceed official regional population projections and would be negligible. Moreover, the above analysis conservatively assumes that all Project residents are new to Los Angeles, whereas the more likely scenario is that many future Project residents already live in the City.[91]

The increase of 172 employees in the City of Los Angeles would also be well within SCAG employment growth forecasts. SCAG forecasts that the number of jobs in the City in year 2025 would be approximately 1,915,868, an increase of 12.9 percent from year 2012. The addition of 172 employees in the Project area would constitute approximately 0.08 percent of the projected increase from year 2012 to 2025. SCAG forecasts that the number of jobs in the City will increase to approximately 2,169,100 by year 2040, which is an increase of 472,700 jobs from 2012. The addition of 172 jobs in the Project area would constitute 0.04 percent of the total projected increase in jobs through 2040.[92] Because population and employment growth associated with the Project would be within SCAG regional growth projections, operation of the Project would not induce substantial population growth in the Project area, either directly or indirectly.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measure that is to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to inducing substantial population growth in an area, either directly or indirectly. This includes Mitigation Measure LU-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of reducing the significant effects from potential growth. As discussed in the impact analysis above, the Project would be within regional and local population forecasts, and

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88 *As discussed in Subsection 3, Threshold 3.a, the analysis in this SCEA utilizes the SCAG's 2016-2040 RTP/SCS growth projections, as the 2016 AQMP incorporates local city general plans and socioeconomic forecast projections of regional population, housing and employment growth from the Southern California Association of Governments (SCAG) and incorporated into SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).*

89 *Based on a linear interpolation of 2012-2040 data.*

90 *SCAG Regional Transportation Plan/Sustainable Communities Strategy. 2016. Available at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx*

91 *While SCAG's 2020-2045 RTP/SCS has not yet been certified by CARB, the Project's growth would be consistent with its population projections as well. Specifically, the 2020 RTP/SCS forecasts the City's population increasing to 4,193,714 persons in 2025, and 4,771,300 persons in 2045, and the Project's 252 residents would reflect approximately 0.14 percent of the City's total projected population growth through year 2025, and approximately 0.03 percent of the City's total projected population growth through year 2045.*

92 *While SCAG's 2020-2045 RTP/SCS has not yet been certified by CARB, the Project's growth would be consistent with its employment projections as well. Specifically, the 2020 RTP/SCS forecasts the City's employment increasing to 1,937,555 jobs in 2025, and 2,135,900 in 2045, and the Project's 172 employees would reflect approximately 0.19 percent of the City's total projected employment growth from 2016 through 2025, and approximately 0.06 percent of the City's total projected employment growth from 2016 through 2045.*

would not induce substantial growth either indirectly or directly. Therefore, the measures included in MM-LU-1(b) are not applicable to the Project, and impacts would be less than significant.

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

Less than Significant Impact. The Project would require the demolition of one single-family residence located at 10812 West Ashton Avenue, which is owned by the Westwood Presbyterian Church. The Project proposes to construct an Eldercare Facility with 176 residential dwelling units and guest rooms. The Project would not displace substantial numbers of existing housing units and would increase the amount of available housing for elderly residents.

The 2016-2040 RTP/SCS PEIR MMRP contains a mitigation measure that is to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to displacing substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere. This includes Mitigation Measure PHE-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. As discussed in the impact analysis above, the Project would not displace substantial numbers of existing housing units. Therefore, the measures included in MM-PHE-2(b) are not applicable to the Project, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The Project would not induce population growth beyond that included in the SCAG 2040 population projections for the City in their 2016-2040 RTP/SCS, or the 2045 population projections contained in the 2020-2045 RTP/SCS. Rather, the Project would be growth-accommodating for the projected population increase in the area. Therefore, the Project would not, directly or indirectly, contribute to significant cumulative impacts associated population and housing.

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4.15 PUBLIC SERVICES

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

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:

i) Fire protection?

Less Than Significant Impact. The analysis below relies on the following metrics from the LAFD to assess potential demands on fire protection and emergency medical services: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. The analysis is based, in part on information available on the LAFD website; and the Utility Infrastructure Technical Memorandum, dated June 5, 2020, which is included in Appendix I of this SCEA.

LAFD provides fire protection and emergency medical services for the City. The fire station closest to the Project Site is Fire Station No. 37, located at 1090 Veteran Avenue, approximately 0.6 miles northwest of the Project Site.[93] The Project Site is not located in a Very High Fire Hazard Severity Zone but is located in a Methane Buffer Zone[94,95].

Construction Impacts

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from

[93] *Los Angeles Fire Department. http://www.lafd.org/ (accessed April 2018).*
[94] *City of Los Angeles. Safety Element of the City of Los Angeles General Plan. November 26, 1996. http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf*
[95] *Department of City Planning. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/*

machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, in accordance with existing regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration (OSHA). Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction of the Project could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, as discussed in Subsection 17, Transportation, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods to the extent feasible, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to PDF-T-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Emergency access to the Project Site would remain unobstructed during construction of the Project.

Operational Impacts

Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 37, the “first-in” station for the Project Site, located approximately 0.6 miles northwest of the Project Site. As such, as described below, Fire Station No. 37 falls within the required 1.0-mile engine company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency. The majority of the Project Site (is occupied by the Church’s sanctuary (Sanctuary), childcare facility, administrative office spaces, Fellowship Hall, and ancillary uses as well as surface parking areas. The southeastern portion of the Project Site is occupied by a Church-owned single-family residence and additional surface parking areas. The proposed Project involves the construction of a new 12-story (153 feet), 176,580 square foot eldercare facility containing up to 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, 46 Alzheimer’s/Dementia Care Housing guest rooms, and as associated residential amenity and service areas (Eldercare Facility), as well as the construction of a new two-story 19,703 square foot building containing childcare facilities and church-related administrative office spaces (Childcare Facility). As discussed in Subsection 14, Population and Housing, implementation of the Project would result in 252 new residents and 172 new employees, which would result in an increase in the on-site service population within the service area of Fire Station No. 37.

While the Project’s residential and employee population would increase the demand for LAFD fire protection and emergency medical services, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communication systems etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection

for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevent features would be provided that would reduce the demand on LAFD facilities and equipment without creating the needs for new facilities.

Response Distance, Emergency Access, and Response Times

The Project would be designed to comply with LAFD high-rise requirements, as included in LAMC Section 57.4705.4 and LAFD Requirement No. 10, as well as truck and engine company response distances of LAMC 57.507.3.3. As noted above, the Project Site is within 0.6 mile of LAFD Station No. 37, which is staffed with an engine, assessment light force, and a paramedic ambulance.[96] An assessment light force consists of a truck, engine, and a paramedic.[97] Therefore, the Project Site is within the prescribed distances of both a truck and engine company and the Project Site would fall within LAFD's maximum prescribed response distance from a fire station with an engine company and a truck company.

As described in 2.0, Project Description, of this SCEA, vehicular access for both the Eldercare Facility and Childcare Facility, including access for emergency vehicles, would be from Wilshire Boulevard via an ingress and egress driveway. Project-related vehicles would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays cause by traffic. However, the area surrounding the Project Site includes an established street system and as discussed in the Transportation Impact Study (Appendix K-2), traffic generated by the Project would not result in significant impacts to the Project area intersections, including intersections along the City-designated disaster routes along Wilshire Boulevard, based on LADOT's criteria. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or diving in the lanes of opposing traffic, pursuant to California Vehicle Code (CVC) Section 21806. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and/or surrounding area. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Overall, impacts with regard to response distances, emergency access, and response times would be less than significant.

To maintain the level of fire protection and emergency services, the LAFD may require additional fire personnel and equipment. However, given that the Project is within an existing service area and there are existing fire stations in close proximity to the Project Site, it is not anticipated that there would be a need to build a new or expand an existing fire station to serve potential future development on the Project Site, or to maintain acceptable service ratios, response times, or other performance objectives for fire protection. By analyzing data from previous years and

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[96] *Los Angeles Fire Department. September 2013. Fire Station Directory. Accessible at: http://www.lafdacs.org/pdf_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf. Accessed July 2019.*

[97] *PA Consulting Group. 2014. City of Los Angeles – Office of the City Administrative Officer. Fire Department Deployment of Resources Study. Accessible at: http://clkrep.lacity.org/onlinedocs/2012/12-0600-S28_misc_03-03-14.pdf*

continuously monitoring current data regarding response times, types of incidents, and call frequencies, LAFD can shift resources to meet local demands for fire protection and emergency services. The Project would not create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Water Flow

The City of Los Angeles Fire Code, Section 507.3, identifies applicable Fire Flow requirements according to a Project's land use classification. High-density Residential and Neighborhood Commercial land uses require 4,000 gallons per minute (gpm) from four adjacent fire hydrants flowing simultaneously. Industrial and Commercial land uses require 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously. The maximum distance between hydrants should be 300 ft. An Information of Fire Flow Availability Report (IFFAR) has been obtained from LADWP showing that there are four hydrants in the greater vicinity of the Project Site flowing simultaneously at 6,000 gpm, thereby demonstrating that sufficient fire flow exists in the vicinity of the Project Site, even if the Project was conservatively classified as an Industrial and Commercial land use (Appendix I). There are currently only three hydrants within the immediate vicinity of the Project Site. Therefore, installation of one additional fire hydrant is required and would be checked as part of the City's building permit plan check process. Specifically, pursuant to Los Angeles Fire Code Section 501.3, construction documents for proposed fire apparatus access, location of fire lanes, security gates across fire apparatus access roads and construction documents and hydraulic calculations for fire hydrant systems shall be submitted to the fire department for review and approval prior to construction. Accordingly, the approved IFFAR and the City's existing regulatory requirements regarding fire hydrants indicate the availability of sufficient water service for the anticipated fire-related water demands for the Project, and impacts related to adequate water flow would be less than significant.

The Project would provide 176 residential dwelling units and guest rooms and would incrementally increase the service population for Fire Station No. 37 and any responding station in the service area. Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In addition, in *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided. The *Hayward* ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the Project will cause a substantial adverse effect on human beings" and the "need for additional fire protection services" is not an environmental impact that CEQA requires a Project proponent to mitigate.

Based on the analysis above, Project construction and/or operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit emergency response. Thus, construction and/or operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to public service impacts (fire protection). These include Mitigation Measure PS-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. These measures referenced in MM PS-1include:

- During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b):

As discussed above, the Project would not have the potential to result in significant environmental impacts pertaining to fire protection. Moreover, the Project incorporates regulatory compliance, design features, and mitigation measures that are consistent with the aforementioned SCAG measures as applicable, as discussed in their respective environmental impact sections of this SCEA. Consistent with the above measures, upon implementation of the Project, facilities and equipment, access for fire protection services, and adequate fire flow/water supply would be maintained. Although no Project-specific impacts would occur, the Project would be consistent with relevant measures under MM-PS-1(b), and impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Development of the Project in combination with the related projects would cumulatively increase the demand for fire protection services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Moreover, all of the cumulative development would be reviewed by LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

ii) Police protection?

Less Than Significant Impact.

The following analysis is based in part on information provided by the Los Angeles Police Department's (LAPD) Community Relationship Division, which is included in Appendix L of this SCEA.

Construction Impacts

Construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature PDF-PS-1 the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction.

Project-related vehicles would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays cause by traffic. However, the area surrounding the Project Site includes an established street system and as discussed in the Transportation Impact Study (Appendix K-1), traffic generated by the Project would not result in significant impacts to the Project area intersections, including intersections along the City-designated disaster routes along Wilshire Boulevard, based on LADOT's criteria. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and/or surrounding area. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area. Overall, impacts with regard to response distances, emergency access, and response times would be less than significant and no new or physically altered police facilities would be required during construction.

Operational Impacts

The Project Site is under the jurisdiction of the LAPD's West Los Angeles Community Police Station, located at 1663 Butler Avenue, approximately 1.7 miles southwest (driving distance) of the Project Site. In 2017, the average response time to calls for service in the West Los Angeles area was 5.8 minutes for emergency calls and 26.2 minutes for non-emergency calls.

The majority of the Project Site is occupied by the Church's Sanctuary, childcare facility, administrative office spaces, Fellowship Hall, and ancillary uses as well as surface parking areas. The southeastern portion of the Project Site is occupied by a Church-owned single-family residence and additional surface parking areas. The proposed Project involves the construction of a new 12-story, 176,580 square foot eldercare facility containing up to 53 Senior Independent Housing dwelling units, 77 Assisted Living Care Housing guest rooms, 46 Alzheimer's/Dementia Care Housing guest rooms, and as associated residential amenity and service areas (Eldercare Facility), as well as the construction of a new two-story 19,703 square foot building containing childcare facilities and church-related administrative office spaces (Childcare Facility).

The Project would include exterior lighting for security purposes, which would promote safety and reduce the demand for police services. The Project plans would be reviewed by the City to ensure

design guidelines relative to security, semi-public and private spaces, are implemented, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed.

As discussed in Subsection 14, Population and Housing, implementation of the Project would result in 252 new residents and 172 new employees, which would result in an increase in the demand for police protection services. Currently, the LAPD has approximately 9,000 sworn officers and 3,000 civilian employees. That is one officer for every 433 residents, giving Los Angeles one of the lowest ratios of police officers to residents of any major city in the country.[98] The Project's new residential population would result in an incremental increase in the service population for the LAPD's West Los Angeles Community Police Station. As discussed above, Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In addition, in *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided. The *Hayward* ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the Project will cause a substantial adverse effect on human beings" and the need for additional public safety services is not an environmental impact that CEQA requires a Project proponent to mitigate.

Based on the analysis above, Project construction and/or operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit emergency response. Thus, construction and/or operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to public service impacts (police protection). These includes Mitigation Measure PS-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. These measures referenced in MM PS-2(b) include:

- Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.
- Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.

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[98] *City of Los Angeles Police Department. Accessible at: http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364. Accessed June 2020.*

- During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).

As discussed above, the Project would not have the potential to result in significant environmental impacts pertaining to police protection. Moreover, the Project incorporates regulatory compliance, design features, and mitigation measures that are consistent with the aforementioned SCAG measures as applicable, as discussed above and in their respective environmental impact sections of this SCEA. Consistent with the above measures, and upon implementation of the Project, facilities and equipment, access for police protection services, and adequate security measure through implementation of PDF-PS-1 would be implemented. As discussed in the impact analysis above, the Project would implement PDF-PS-1 related to security measures; as discussed below, PDF-T-1 would be implemented related to maintaining site access during construction, and the Project would comply with all regulatory compliance measures, such that no Project level impacts related to no new or physically altered police protection facilities would occur. Therefore, regulatory compliance and PDF-PS-1 are equal to or more effective than relevant measures under MM-PS-2(b).

Therefore, impacts would be less than significant.

Project Design Features

PDF-PS-1 Security Measures. During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project's contractor will document the security measures being implemented.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

It is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

iii) Schools?

Less Than Significant Impact. The Project Site is located within the Los Angeles Unified School District (LAUSD) and would be served by Fairburn Avenue Elementary (0.5 mile to the east), Emerson Community Charter (0.4 mile to the south), and University Senior High (2 miles away).[99]

Construction Impacts

There are no schools in the direct vicinity of the Project Site. The existing childcare facility would remain until the new one is constructed and ready to occupy, at which time the existing facility would be demolished to make way for construction of the eldercare facility. As such, there would be no impacts during construction related to school access, traffic, or student safety. Regardless, pursuant to PDF-T-1, through implementation of a Construction Traffic Management Plan, adequate and safe access would remain available within and near the Project Site during construction activities.

Operational Impacts

The following analysis is based in part on information provided by the City of Los Angeles Unified School District, which is included in Appendix L of this SCEA. The Project would introduce 176 new residential dwelling units and guest rooms. However, all units would be occupied by seniors (age for residency must be 75 and older or require care) and would not generate new students requiring services from the LAUSD. Therefore, the Project would not directly increase the population of school-aged children or school enrollment.

In addition, pursuant to Senate Bill 50, the Applicant would be required to pay state-mandated school impact fees to LAUSD prior to issuance of a building permit. Pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "… is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Overall, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to public service impacts (schools). These includes Mitigation Measure PS-3(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the 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 that are within the jurisdiction and responsibility of school districts and local jurisdictions. These measures referenced in PS-3(b) include:

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[99] *Los Angeles Unified School District (LAUSD). n.d. Resident School Identifier. http://rsi.lausd.net/ResidentSchoolIdentifier/*

- Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.
- During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).

As discussed above, the Project would not have the potential to result in significant environmental impacts pertaining to schools. Moreover, the Project incorporates regulatory compliance (including required payment of school district fees), design features, and mitigation measures that are consistent with the aforementioned SCAG measures as applicable, as discussed above and in their respective environmental impact sections of this SCEA. Therefore, regulatory compliance is equal to or more effective than relevant measures under MM-PS-3(b), and the Project's impact on schools would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully mitigate any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

iv) Parks?

Less Than Significant Impact.

Construction Impacts

There would be no impact related to construction activities, as construction workers would not demand and utilize parks services, and no facilities would be burdened such that new or expanded facilities would be required.

Operational Impacts

The following analysis is based in part on information provided by the City of Los Angeles Recreation and Parks (RAP) Department, which is included in Appendix L of this SCEA. Per the response letter from the Department, the Project would incrementally increase demand for parks and recreation facilities, and the Project would be required to mitigate this through land dedication or payment of in-lieu fees (or combination) (Appendix L).

The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The parks closest to the Project Site are Westwood Recreation Center, Tennis Courts, and

Pool (0.6 miles away), Felicia Mahood Multipurpose Center (1.1. miles away), Holmby Park (1.2 miles away), Barrington Recreation Center (1.6 miles away), and Stoner Recreation Center, Pool, and Park (1.6 miles away). [100]

The Quimby Act, codified in Government Code Section 66477, was enacted in 1965 in an effort to promote the availability of park and open space areas in California and respond to the increased rate of urbanization and need for open space. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Within the City, the Quimby Act is implemented by Los Angeles Municipal Code (LAMC) Section 12.33, which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The Quimby Act permits the City to require parkland dedications not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and/or in-lieu fee payments for residential development projects.

In September 2016, the City amended LAMC Section 12.33 (the Park Ordinance), and those amendments became effective January 11, 2017.[101] The aim of the amended Park Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The amended Park Ordinance increased Quimby fees, provided a new impact fee for non-subdivision projects, eliminated the deferral of park fees for market rate projects that include residential units, increases the fee-spending radii from the site from which the fee is collected, provided for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updated the provisions for credits against park fees.

Pursuant to a letter issued to the Planning Department on April 9, 2020, RAP staff are recommending that a condition of approval be implemented for the Project requiring the payment of in-lieu fees in order to fulfill the Project's obligations under the provisions of LAMC 12.33. Compliance with this condition will reduce any potential impacts to parks to a less than significant level.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to parks and recreational facilities. This includes Mitigation Measure REC-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. These measures referenced in REC-1(b) include:

- Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.

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[100] *Department of Parks and Recreation. 2018. Facility Map Locator. https://www.laparks.org/*

[101] *Ordinance No. 184505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.*

- Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - Increasing the accessibility to natural areas for outdoor recreation.
  - Promoting infill development and redevelopment to revitalize existing communities.
  - Utilizing "green" development techniques.
  - Promoting water-efficient land use and development.
  - Encouraging multiple uses.
  - Including trail systems and trail segments in General Plan recreation standards.

Consistent with the above measures, and as described in the impact analysis above, the Project would be required to pay in-lieu fees associated with maintaining parks and recreational facilities pursuant to existing regulatory requirements, which would mitigate the Project's increased demand on recreational facilities. In addition, the Project would include recreational amenities on-site, and promote infill development and re-development of the Project Site. Although no Project-specific impacts would occur, the Project would be consistent with relevant measures under MM-REC-1(b), and impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax or other park fees pursuant to Section 12.33 of the LAMC, as appropriate to the projects' location and proposed uses. The payment of fees would mitigate any potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

v) Other public facilities?

Less Than Significant Impact. The following analysis is based in part on information provided by the City of Los Angeles Public Library (LAPL), which is included in Appendix L of this SCEA. Per the response letter from the LAPL, the LAPL anticipates that increases in residential development in the City would have an impact on existing library services (Appendix L). The library closest to the Project Site is Westwood Branch Library, located at 1246 Glendon Avenue, approximately 550 feet west of the Project Site.[102] The Project Site is also served by the West Los Angeles Regional Library (1.1 miles to the southwest) and the Donald Bruce Kaufman – Brentwood Branch Library (1.7 miles to the west).

The Project would result in an increase of 252 residents in the City, which could result in incrementally increased demand for library services and resources of the LAPL System. While the new residents generated by the Project would be anticipated to make use of the various

[102] *Los Angeles Public Library System. n.d. Find a Library. https://www.lapl.org/branches (accessed April 2018).*

libraries serving the Project Site, not all residents would use the library or travel to the same library. In addition, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown would reduce demand at physical library locations. As such, demand for library facilities would be alleviated by internet service provided throughout the residential and other uses of the Project.[103, 104] The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Library patrons also have access to podcasts, language learning programs, instructional content, and electronic editions of newspapers and magazines through smartphone applications made available to library cardholders. Further, demand for LAPL services may be lessened because the Project Site is approximately 0.9 miles away from the University of California, Los Angeles Powell Library. In addition, two separate on-site libraries would be located on-site, one at the Eldercare Facility and other at the Childcare Facility.

Notwithstanding, as a condition of approval for the Project, the Project Applicant would be required to pay a per capita fee to the LAPL to be used for staff, books, computers, and other library materials. These fees would serve to offset the Project's potential incremental increased demand for library facilities and services (Appendix L).

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a projects potential to result in impacts related to library facilities. Although no mitigation measures were included for library facilities directly, the 2016-2040 RTP/SCS PEIR MMRP identified measures applicable to general impacts to public facilities. This includes Mitigation Measure PS-2(b), listed in detail in Section 3.3 of this SCEA. These measures referenced in PS-2(b) include:

- Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description.
- Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.

Consistent with the above measures, the LAPL was contacted, the results of which determined the Project Applicant would be required to pay a per capita fee to the LAPL to be used for staff, books, computers, and other library materials and that these fees would serve to offset the Project's potential incremental increased demand for library facilities and services. Although no Project-specific impacts would occur, the Project would be consistent with relevant measures under MM-REC-1(b) including payment of a per capita fee to LAPL. The Project would not 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 for libraries and other public facilities, and impacts to libraries would be less than significant.

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[103] *Denise A. Troll, How and Why Libraries are Changing: What we Know and What we Need to Know, Carnegie Mellon University, 2002.*

[104] *Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.*

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

As discussed above, library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Similar to the Project, the related projects in the area would be required to pay the required City fees. Therefore, the cumulative impact would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

4.16 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 facility would occur or be accelerated?

Less Than Significant Impact. As identified by the City of Los Angeles Department of Recreation and Parks, the City's parks system consists of approximately 16,000 acres of parklands (City of Los Angeles 2016c). The parks closest to the Project Site are Westwood Recreation Center, Tennis Courts, and Pool (0.6 mile away), Felicia Mahood Multipurpose Center (1.1. miles away), Holmby Park (1.2 miles away), Barrington Recreation Center (1.6 miles away), and Stoner Recreation Center, Pool, and Park (1.6 miles away).[105] The City's current (2020) population is estimated at 4,010,684 persons.[106] Consequently, there are about 4.0 acres of parkland for every 1,000 residents and the City currently meets the standard ratio for parkland in the Quimby Act (California Department of Parks and Recreation 2002).

As discussed above in Threshold 15.d, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of in-lieu park fees and/or the dedication of park land with regard to the residential component of the Project. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. Specifically, LAMC Section 12.21G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. The Eldercare Facility would provide common and private open space pursuant to LAMC Section 12.21G. Specifically, the proposed 53 senior independent living dwelling units consist of 40 one-bedroom units (requiring 4,000 square feet of open space [at 100 square feet per unit]) and 13 two-bedroom units (requiring 1,625 square feet of open space [at 125 square feet per unit]), for a total Eldercare Facility open space requirement of 5,625 square feet. The Eldercare Facility would provide 9,909 square feet of open space, consisting of 1,941 square feet of exterior common open space (consisting of the ground-level entrance plaza and level 3 terrace), 7,918 square feet of interior common open space (consisting of a screening room, pool/lounge area, day rooms, and other

[105] *City of Los Angeles. 2018. Department of Parks and Recreation. Facility Map Locator.*
[106] *DOF 2020*

lounge and game rooms), and 50 square feet of private open space (consisting of a private upper-level terrace)[107].

Overall, due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, it is anticipated that Project residents, children, and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize offsite public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, as discussed in Subsection 15, Threshold 15.iv, pursuant to Section 12.33 of the LAMC, the Applicant would be required to pay in-lieu park fees and/or dedicate park land with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to parks and recreational facilities. This includes Mitigation Measure REC-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. These measures referenced in REC-1(b) include:

- Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
    - Increasing the accessibility to natural areas for outdoor recreation.
    - Promoting infill development and redevelopment to revitalize existing communities.
    - Utilizing "green" development techniques.
    - Promoting water-efficient land use and development.
    - Encouraging multiple uses.
    - Including trail systems and trail segments in General Plan recreation standards.

Consistent with the above measures, and as discussed in the impact analysis above, the Project would comply with all regulatory compliance measures (payment of in-lieu fees) associated with maintaining parks and recreational facilities, include recreational amenities on-site, and promote infill development and re-development of the Project Site. Although no Project-specific impacts would occur, the Project would be consistent with relevant measures under MM-REC-1(b), and impacts would be less than significant.

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[107] *As discussed in Section 2.0, Project Description, pursuant to the Project's Eldercare Facility Unified Permit request, a deviation from LAMC 12.21 G's 25 percent limitation on qualifying interior common open space is being sought, as well as a determination to allow the proposed mix of outdoor and interior common open space.*

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. The Eldercare Facility would include interior and exterior common open spaces including indoor activity and community rooms, a gym, a screening room, and a pool to serve residents' recreational needs. The Childcare Facility would include development of a children's play area in the southwestern portion of the Project Site, and a small toddler play area along the northeastern façade of the building. The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities and existing parks in the Project area. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to parks and recreational facilities. This includes Mitigation Measure REC-1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. These measures referenced in REC-1(b) include:

- Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
    - Increasing the accessibility to natural areas for outdoor recreation.
    - Promoting infill development and redevelopment to revitalize existing communities.
    - Utilizing "green" development techniques.
    - Promoting water-efficient land use and development.
    - Encouraging multiple uses.
    - Including trail systems and trail segments in General Plan recreation standards.

Consistent with the above measures, the Project would comply with all regulatory compliance measures (payment of in-lieu fees) associated with maintaining parks and recreational facilities, include recreational amenities on-site, and promote infill development and re-development of the Project Site. Although no Project-specific impacts would occur, the Project would be consistent with relevant measures under MM-REC-1(b), and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5

miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The Project would not induce population growth beyond that included in the population projections for the City in SCAG's 2016-2040 RTP/SCS or 2020-2045 RTP/SCS. and thereby would not, directly or indirectly, contribute to significant cumulative impacts to recreation. Similar to the Project, the related projects in the area would be required to pay a Dwelling Unit Construction Tax, Park Fees pursuant to LAMC Section 12.33, or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and impacts would be less than significant.

4.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Would the project 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?	☐	☐	☒	☐

The following analysis is based, in part, on the transportation-related reports prepared for the Project. A Transportation Impact Study (TIS) was prepared by LLG Engineers in March 2019 that evaluated traffic associated with Project construction and operation, including but not limited to, levels of service, site access, circulation, operational plan, hazards, etc.), pursuant to LADOT's Transportation Impact Study Guidelines (December 2016). On April 23, 2019, LADOT issued its assessment letter approving the TIS. This TIS is included as Appendix K-1. A Construction Traffic Analysis Memo prepared by LLG Engineers in March 2019, which is included as Appendix K-2.

Following the City's adoption of its new transportation thresholds pertaining to VMT, and LADOT's associated adoption of updated Transportation Assessment Guidelines (TAG) (July 2019), a VMT assessment was subsequently prepared for the Project by LLG Engineers and approved by LADOT. This VMT assessment is included as Appendix K-3. The LADOT approval letter of the Project's VMT assessment is included as Appendix K-4, which addresses the totality of the transportation analysis.

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

Less Than Significant Impact. The Project's consistency with plans and policies guiding development and transportation networks in Los Angeles is analyzed below. Although the Project's traffic study was approved under the City's former Transportation Impact Study Guidelines (December 2016), for purposes of identifying relevant plans and policies, the plans and policies identified under Threshold T-1 of LADOT's current TAG (July 2020) have been utilized in the following consistency analysis. A project would be considered consistent with a policy if it is generally in conformance and does not obstruct the implementation of that policy or preclude future improvements. If a conflict is identified, mitigation measures would focus on improving access, comfort, and safety for all road users, especially pedestrians, bicyclists, and transit riders.

Plans, Programs, Ordinances, And Policies

Table 2.1-1 of the TAG identifies a series of City documents or plans that establish the regulatory framework for development in the City. Table 2.1-2 of the TAG provides a list of questions to help guide whether a project conflicts with the City's plans, programs, ordinances, or policies. Each of the documents listed in Table 2.1-1 of the TAG was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance.

Mobility Plan

The Mobility Plan combines "complete street" principles with the following goals and objectives that define the City's mobility priorities:

- Safety First: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode choice.
- World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
- Access for all Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
- Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future.
- Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Project would be consistent with these mobility goals. In summary, the Project provides direct pedestrian access to the Project Site from sidewalks along Wilshire Boulevard across a landscaped plaza and to a lobby for the Eldercare Facility. Similarly, pedestrian access to the Childcare Facility is provided from sidewalks along Ashton Avenue. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along streets with existing bicycle facilities. The Project would maintain the designated driveway and roadway width requirements as indicated in the Mobility Plan.

The Project encourages non-motorized travel through provision of short- and long-term bicycle parking and promotes transit usage by developing new senior housing opportunities as well as an expanded preschool within walking distance of multiple existing rapid and local bus lines as well as the future Metro D (Purple) Line Westwood/UCLA station. All sidewalks and curb ramps along the Project frontage would be designed in compliance with ADA standards to achieve accessibility for all patrons of the Project. In addition, the Project includes a mix of land uses including church and senior residential uses to encourage interaction between components within a walkable environment in close proximity to transit and a multitude of neighborhood services available in the immediate Westwood area, thereby reducing the number of trips made by vehicle and therefore reducing overall vehicle miles traveled (VMT), consistent with City and State transportation and greenhouse gas (GHG) policies and objectives. The Project would also provide sufficient off-street parking to accommodate the Project's parking demand.

The Project does not hinder other goals and policies identified in the Mobility Plan. Therefore, the Project is consistent with and would not obstruct the implementation of the Mobility Plan.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Los Angeles Department of City Planning, March 2015) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.

The Project will be consistent with the Plan for a Healthy Los Angeles by prioritizing safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing clearly distinct pedestrian and vehicular access points. Further, the Project supports healthy lifestyles by locating new senior housing as well as expanded childcare facilities near transit, providing bicycle parking, and enhancing the pedestrian environment by providing street trees and a landscaped plaza along Wilshire Boulevard to create a more comfortable environment for pedestrians. Thus, the Project would be consistent with the goals of Plan for a Healthy Los Angeles.

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles. The Project is located within the Westwood Community Plan area. A detailed analysis of the Project's consistency with the Westwood Community Plan is provided in Table 4-17 under Subsection 11, Land Use and Planning. The Project is also consistent with the circulation standards and criteria of the Westwood Community Plan as the transportation system adjacent to the Project Site, including Wilshire Boulevard to the north and Ashton Avenue to the south, would adequately serve the traffic generated by the Project without major congestion, as demonstrated by the Project's approved traffic assessments. Therefore, the Project would be consistent with the Community Plan.

Los Angeles Municipal Code (LAMC) Section 12.21A.16

LAMC Section 12.21A.16 details the bicycle parking requirements for new developments. As described in the Project Description, the Project's senior housing units, existing Church Sanctuary, and replacement Church office and Childcare Facilities would require 27 short-term and 43 long-term bicycle spaces. The Project's bicycle parking supply would comply with LAMC requirements.

LAMC Section 12.26.J

LAMC Section 12.26.J is the City's TDM Ordinance, which establishes trip reduction requirements for non-residential projects in excess of 25,000 sf. The Project's new non-residential component would not exceed 25,000 sf, and therefore LAMC Section 12.26J would not apply to the Project. Therefore, the Project would not conflict with the requirements of LAMC Section 12.26J. Nonetheless, the Project will implement measures that will reduce trips such as bicycle parking spaces.

LAMC Section 12.37

LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right-of-way standards consistent with street designations from the Mobility Plan. Adjacent to the Project, Wilshire Boulevard and Ashton Avenue are adequately dedicated and improved. In connection with the required fire department hammerhead turnaround that is anticipated to be required at the southern portion of the Project Site, the Applicant has requested a waiver of this

potential dedication requirement. However, adequate turnaround area would be ensured through the Applicant's execution of a private easement agreement. Therefore, the Project would be consistent with LAMC Section 12.37.

Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets. The City has identified a number of streets as part of the High Injury Network where City projects will be targeted. The Project Site is not located adjacent to a street identified as part of the High Injury Network. Moreover, the Project improvements to the pedestrian environment would not preclude future Vision Zero safety improvements by the City, should they be deemed necessary. Thus, the Project does not conflict with Vision Zero.

Streetscape Plans

There are no streetscape plans adjacent to the Project Site and, therefore, streetscape plans do not apply to the Project. As set forth in Subsection 11, Land Use and Planning, the Project will comply with the landscaping and street tree requirements of the Wilshire-Westwood Scenic Corridor Specific Plan.

Citywide Design Guidelines for Residential, Commercial, and Industrial Development

Citywide Design Guidelines (Los Angeles City Planning Urban Design Studio, October 2019) identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The design guidelines are organized around the following approaches:

Pedestrian-first Design

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

360-degree Design

- Guideline 4: Organize and shape projects to recognize and respect surrounding context.
- Guideline 5: Express a clear and coherent architectural idea.
- Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
- Guideline 7: Carefully arrange design elements and uses to protect site users.

Climate-adapted Design

- Guideline 8: Protect the site's unique natural resources and features
- Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

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

The Project would be consistent with the Design Guidelines. Adequate sidewalks along Wilshire Boulevard would be provided in accordance with the City's Living Streets design considerations. Additionally, street trees would be incorporated to provide shade for a more comfortable mobility environment for pedestrians. Therefore, the Project would align with Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes.

Walkability Checklist

City of Los Angeles Walkability Checklist – Guidance for Entitlement Review (City of Los Angeles Department of City Planning, November 2008) serves as a guide for creating improved conditions for pedestrians to travel and contribute to the overall walkability of the City and includes the following topics:

- Sidewalks
- Crosswalks/Street Crossings
- On-Street Parking
- Utilities
- Building Orientation
- Off-Street Parking and Driveways
- On-Site Landscaping
- Building Façade
- Building Signage and Lighting

The Project incorporates many of the recommended strategies applicable to residential and commercial developments, including but not limited to providing continuous and adequate sidewalks along the Project Site, designing direct primary entrances for pedestrians to be visible and ADA accessible, and locating parking predominantly underground rather than exposed to those traveling on adjacent streets. Because the Project would include many of the recommended strategies, the Project is consistent with City of Los Angeles Walkability Checklist.

LADOT Manual of Policies and Procedures (Design Standards)

LADOT's Manual of Policies and Procedures provides plans and requirements for traffic infrastructure features in the City, including driveway design and placement guidelines in Section 321. The Project's driveways would be consistent with this document's driveway location planning guidelines. In addition, the driveway and reservoir area would be designed in compliance with these guidelines to provide sufficient internal queuing space and ensure safety for pedestrians. The Project does not interfere with any of the policies and procedures contained in this document. Additionally, the Project would comply with all applicable LADOT design standards.

Cumulative Analysis

Similar to the Project, the related projects considered in the approved transportation assessment would be individually responsible for complying with relevant plans, programs, ordinances, or

policies addressing the circulation system. Thus, the Project, together with the related projects, would not result in cumulative impacts with respect to consistency with each of the plans, ordinances, or policies reviewed. Therefore, the Project, together with the related projects, would not create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Pedestrian Impacts

The Project is designed to encourage pedestrian activity and walking as a transportation mode. As discussed in the TIS, a pedestrian walkability analysis was conducted for Project Site. Walkability[108] describes the extent to which walking is readily available as a safe, connected, accessible and pleasant mode of transport. The calculations of walkability for an address are determined by locating nearby stores, restaurants, schools, parks, etc., and how easy it is to live a car-lite lifestyle. The walkability score for the Project was determined to be approximately 86 (Very Walkable) out of 100, which is valued as a positive score. As discussed in the TIS, the Project is designed to provide connections to the adjacent public sidewalks and would include Project Site enhancements to promote walkability.

Bicycle Impacts

Bicycle access to the Project Site is facilitated by the City of Los Angeles bicycle roadway network. Proposed Class II Bicycle Lanes in the City's Mobility Plan 2035 (which includes the City's 2010 Bicycle Plan) are located within an approximate one-mile radius from the Project Site. Similar to the Pedestrian walk score analysis discussed above, a bike score[109] of approximately 75 (Very Bikeable) out of 100 was determined for the Project Site (valued as a positive score). Walk Score calculates the bike score of an address by locating nearby bicycling facilities as well as connections to bus/rail transit routes and stops.

Public Transit Impacts

Public bus transit service in the Project area is currently provided by the Antelope Valley Transit Authority (AVTA), City of Santa Monica, City of Culver City, City of Los Angeles Department of Transportation (LADOT), Los Angeles County Metropolitan Transportation Authority (Metro), and the City of Santa Clarita. The nearest bus stop to the Project Site is located at Wilshire and Glendon, which provides LA Metro Bus Line 20 connections.

The Project would not introduce features that would conflict with existing policies, plans, or programs for pedestrian, bicycle, or public transit services or reduce performance or safety of such facilities. No impact with respect to public transportation or alternative transportation plans, policies, or programs would occur.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to conflicts with the effectiveness of the local circulatory network (including roadways, pedestrian, bicycle, and public transit facilities. This includes Mitigation Measures TRA-

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[108] *As discussed in the Transportation Impact Study prepared by LLG Engineers; (see Appendix K), Walkability is a reference metric which generates a walkability score for a project site. Walk Score calculates the walkability of an address by locating nearby stores, restaurants, schools, parks, etc. Refer to: http://www.walkscore.com/,*

[109] *As discussed in the Transportation Impact Study prepared by LLG Engineers; (see Appendix K), Walk Score also calculates a bike score based on the topography, number and proximity of bike lanes, etc., near the project site. For example, refer to http://www.walkscore.com/, which generates a bike score of approximately 75 (Very Bikeable) out of 100 for the project site. Walk Score calculates the bike score of an address by locating nearby bicycling facilities as well as connections to bus/rail transit routes and stops.*

1(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. These measures referenced in TRA-1(b) include:

- Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible.
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.
- Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives.

As discussed in the impact analysis above, the Project would comply with the applicable plans, policies, and regulations governing the local circulatory network for all transportation modes, and no potential conflict would occur. Therefore, the measures included in Mitigation Measure TRA-1(b) are not applicable to the Project. Notwithstanding, as discussed above and below, the Project would be located in close proximity to existing and proposed transit infrastructure and would include bicycle parking and electric vehicle parking in conformance with the LAMC's requirements. Impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact. On July 30, 2019, pursuant to SB 743 and the recent changes to Section 15064.3 of the State's CEQA Guidelines, the City of Los Angeles adopted VMT as the applicable criteria for determining transportation impacts under CEQA. The current LADOT TAG provide instructions on preparing transportation assessments for land use proposal and defines the significant impact thresholds. The LADOT VMT Calculator tool measures project impacts in terms of Household VMT per Capita and Work VMT per Employee. DOT identified distinct thresholds for significant VMT impacts for each of the seven Area Planning Commission (APC) areas in the City. For the West Los Angeles APC area, in which the Project is located, the following thresholds have been established:

- Household VMT per Capita: 7.4
- Work VMT per Employee: 11.1

The proposed Project is projected to have Household VMT per Capita of 6.0 and Work VMT per Employee of 2.9 (Appendix K-3 and K-4). Therefore, the Project would not exceed the LADOT thresholds for Household VMT (7.4) and Work VMT (11.1).

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measure that is to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to VMT. This includes Mitigation Measure TRA-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, vehicle hours of delay (VHD) and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. As described in the impact analysis above, the Project would not exceed the LADOT thresholds for VMT and would be consistent with Section 15064.3 of the CEQA Guidelines. Therefore, the

measures included in Mitigation Measure TRA-2(b) are not applicable to the Project, and no impact would occur.

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

No Impact. The Project would involve infill construction in an urbanized area. No sharp curves, incompatible uses, new intersections or roadways are proposed. As mentioned in Threshold 17.a, the Project's impact on roadways and intersections in the area was evaluated in a Transportation Impact Study (Appendix K-1). As such, the forecasted vehicle trips generated by the Project would not increase potentially hazardous conditions on local roadways or intersections. In addition, as discussed in the TIS, the Project Site is not located along Westwood Boulevard or Glendon Avenue, which are identified as High Injury Network streets in the City.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment. Therefore, no mitigation measures are applicable. No impact related to increased traffic hazards or incompatible uses would occur.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact.

Construction Impacts

During the construction of the Project, as well as the potential concurrent construction of related Projects, it is expected that emergency vehicles would continue to utilize the surrounding street system (i.e., particularly Wilshire Boulevard) even though some travel lanes along certain portions of some roadways may be temporarily used for construction staging and/or material delivery. If required, drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes to pass through crowded intersections or streets.

Pursuant to current City policies, the Project Applicant would be required to prepare and implement a Construction Staging and Traffic Management Plan (CSTMP) (included as PDF-T-1) to address any anticipated temporary lane closures or re-routing of vehicle and bicycle traffic, sidewalk closures or pedestrian re-routing. With implementation of the CSTMP, any potential lane or sidewalk closures would not be anticipated to be hazards to roadway travelers, including police and fire department staff, and/or pedestrians. With preparation of a CSTMP, emergency vehicles are expected to continue to negotiate typical street conditions in urban areas including areas near any temporary travel lane closure(s) and no impacts related to emergency access during construction are anticipated.

PDF-T-1 **Construction Staging and Traffic Management Plan.** Consistent with LADOT's recommendation and requirements, the Project Applicant shall prepare a detailed Construction Staging and Traffic Management Plan (CSTMP), which would include any applicable street/lane/sidewalk closure information, a detour plan, haul route(s), and a staging plan. The plan shall be based on the nature and timing of the Project's specific construction activities and shall consider other Projects under construction in the immediate vicinity of the Project Site. The CSTMP also shall

include features such as notification to adjacent Project owners and occupants of upcoming construction activities, advance notification regarding any temporary transit stop relocations, and limitation of any potential roadway lane closure(s) to off-peak travel periods, to the extent feasible. Specifically, the CSTMP shall include, but not be limited to, the following measures:

- Advance notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries, per the Worksite Traffic Control Plan.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address any potential conflicts with existing transit service.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Schedule delivery of construction materials and hauling/transport of oversize loads to non-peak travel periods, to the extent possible. No hauling or transport shall be allowed during nighttime hours, Sundays, or federal holidays unless required by Caltrans or LADOT.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety, as may be necessary.
- Installation of truck crossing signs within 300 feet of the exit of the Project Site in each direction.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the Project Site readily visible to any interested party during Project Site preparation, grading, and construction.
- Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities, if needed.

With implementation of PDF-T-1, pedestrian and traffic impacts during construction would be reduced and emergency response access would be maintained. This impact would be less than significant.

Operational Impacts

Access to the Project Site is currently provided via existing driveways along Wilshire Boulevard and Ashton Avenue. Wilshire Boulevard provides access to the northern portion of the Project Site, while Ashton Avenue leads directly into the southern portion of the Project Site from the east. A new curb cut along Wilshire is proposed for a new drop-off area for vehicles traveling east along Wilshire Boulevard, for a total of three Project Site access driveways. Following drop-off, vehicles would either depart via Wilshire Boulevard, or access the proposed subterranean parking garage from the drive aisle along the eastern portion of the Project Site. From Wilshire Boulevard, vehicles would also access the Eldercare Facility's residential lobby. The individual project sites would be reviewed by the City of Los Angeles Fire Department to ensure that adequate site access is maintained for emergency response vehicles during operation of the Project. Because the Project would maintain adequate emergency access during operation of the Project, impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in inadequate emergency access. This includes Mitigation Measure TRA-5(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Specifically, these measures include:

- Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction.

As discussed in the impact analysis above and consistent with the measures included in MM-TRA-5(b), the Project would incorporate a construction staging and traffic management plan through PDF-T-1 to ensure access is maintained, and no Project-specific impacts related to emergency access would occur. Since the Project would not have the potential to result in inadequate emergency access and implements PDF-T-1, which is equal to or more effective than relevant measures under MM TRA-5(b), impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the proposed Project, in conjunction with the related projects, would result in an intensification of existing traffic in an already urbanized area of Los Angeles. With regard to transportation plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Project, each related

project would be subject to the LADOT approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential traffic impacts such that no significant impacts with regard to traffic would occur. As discussed above the Project would not exceed LADOT thresholds for VMT per capita or VMT per employee. As such, according to the TAG, projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e. VMT per capita or VMT per employee) in the project impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Therefore, the Project will not contribute to any significant cumulative transportation impacts when considered with related projects and the Project's contribution to cumulative impacts would not be cumulatively considerable.

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4.18 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

A Tribal Cultural Resources report was prepared for the Project in March 2019 and included as Appendix M of this SCEA.

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

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

No Impact. As discussed in response to Threshold 5.a, the Project Site contains the Sanctuary building, which has been identified as being eligible for listing in the California Register as well as eligible for designation as a City HCM. However, no significant tribal cultural resources are known to exist at the Project Site, and as discussed in response to Threshold 5.a, based on a records search conducted by the South Central Coast Information Center, no cultural resource sites have been recorded at the Project Site and no resources have been identified at the Project Site (See Appendix E).

Based on these results, the Project Site contains a relatively low sensitivity for significant archaeological remains that would qualify as TCRs. Nonetheless, the City has established a standard condition of approval to address inadvertent discovery of TCRs. Should TCRs be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed

Project. If the City determines that the object or artifact appears to be a TCR, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered TCRs. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a TCR monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to tribal cultural resources. These includes Mitigation Measure CUL-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Specifically, Mitigation Measure CUL-2(b) includes the following recommended measures that are relevant to the Project:

- Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area and identify the Native American(s) to contact to obtain information about the project site.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.

Consistent with the above measure, the NAHC and individual tribes in the area were contacted. As described in the impact analysis above, based on the negative results and the implementation of the City's established condition of approval to address any inadvertent discovery of a tribal cultural resource, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Since no Project level impacts have been identified, and the Project incorporates measures consistent with measures identified by MM-CUL-2(b), no impacts will occur.

(b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) to 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?

No Impact. 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." Pursuant to AB 52 and California Public Resources Code Section 20184.2, "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". It 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).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. 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
2. 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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

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. 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 discussed in the Tribal Cultural Resources report, in compliance with the requirements of AB 52, the City provided formal notification of the Project on October 30, 2018, to the following tribes:

- Soboba Band of Luiseno Indians
- Gabrielino-Tongva Tribe[110]
- San Fernando Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino-Tongva Nation
- Fernandeno Tataviam Band of Mission Indians
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Torres Martinez Desert Cauilla Indians
- Gabrieleño Band of Mission Indians-Kizh Nation

The 30-day response period for the notification period concluded on November 30, 2018. On November 2, 2018, the City received a request for consultation from Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation who asserted that the area is part of a cultural landscape and was of cultural value to the tribe, and although no known TCRs are located on the Project Site, Mr. Salas stated that unanticipated TCRs may be encountered during ground-disturbing activities. On February 13, 2019, the City and Mr. Salas engaged in consultation via phone conference, which did not result in the identification of any TCRs (see Attachment B in Appendix M).

CEQA only requires mitigation measures if substantial evidence of potentially significant impacts exists. CEQA Guidelines Section 15126.4(a)(4)(A) states that there must be an essential nexus between the mitigation measure and legitimate government interest (i.e., potential significant impacts). Based upon the consultation results and lack of identified tribal resources on-site (see Appendix M), the City has determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources.

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[110] *Several Tribes refer to themselves as Bavrielino-Tongva Nation or Tribe.*

Based on these results, on July 8, 2019, the City sent a notification letter to the Tribe, stating the completion of consultation for the Project pursuant to AB 52, and confirming the City's determination that no significant impact to TCRs had been identified. No further communication has been received from the Tribe. The Tribe may submit comment comments on the SCEA as long as comments are received prior to the approval of the document.

While no tribal cultural resources are anticipated to be affected by the Project, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of a tribal cultural resource. Should tribal cultural resources be inadvertently encountered during Project construction, this condition of approval requires the temporarily halting of construction activities near the encounter and notification of the City and any Native American tribes traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the potential resource appears to be a tribal cultural resources (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as treatment and disposition of any discovered tribal resources. The Project Applicant would then be required to implement the tribes recommendation if a qualified archaeologist concludes that the tribe's recommendations are reasonable and feasible. The recommendations would be incorporated into a tribal cultural resources monitoring plan, and once the plan is approved by the City, ground disturbance activities would be permitted to resume. In accordance with this condition of approval, all related activities would be conducted in accordance with regulatory requirements.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to tribal cultural resources. These includes Mitigation Measure CUL-2(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Specifically, Mitigation Measure CUL-2(b) includes the following recommended measures that are relevant to the Project:

- Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.
- Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.

Consistent with the above measure, the NAHC and individual tribes in the area were contacted. As described in the impact analysis above, based on the negative results and the implementation of the City's established condition of approval to address any inadvertent discovery of a tribal cultural resource, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Since no Project level impacts have been identified, and the Project incorporates measures consistent with measures identified by MM-CUL-2(b), there would be impact.

Cumulative Impacts

Less Than Significant Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5

miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The Project has met the requirements of AB 52, and any other future projects in the area would be required to undergo similar consultation requirements and implement the City's standard conditions for tribal cultural resources. Because no tribal cultural resources have been identified on the Project Site, there is no potential for cumulative impacts to occur and the Project's cumulative impact would not be cumulatively considerable.

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4.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 reasonable foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact.

Water

Construction Impacts

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. As discussed in the Utilities Technical Memorandum, based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd) (Appendix I). Temporary construction water use would be around the same as the existing water consumption at the Project Site which is currently adequately being met by the existing

water infrastructure, and it is anticipated that the existing water supplies would continue to meet the limited and temporary water demand associated with construction of the Project (Appendix I).

The Project would require construction of new, on-site water distribution lines to serve the new buildings and facilities. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines (Appendix I). During construction activities, emergency access to the Project Site as well as existing vehicular and non-vehicular traffic flow would be preserved by the construction management plan approved by the City for the Project (see PDF-T-1 in Subsection 17, Transportation). Installation of any required water infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Impacts related to construction or relocation of water facilities would be less than significant.

Operational Impacts

According to the City of Los Angeles Fire Code Section 501.3, construction documents for proposed fire apparatus access, location of fire lanes, security gates across fire apparatus access roads and construction documents and hydraulic calculations for fire hydrant systems shall be submitted to the fire department for review and approval prior to construction. In addition, Section 507.3 indicates the Fire Flow requirements according to land use. High-density Residential and Neighborhood Commercial land uses require 4,000 GPM from four adjacent fire hydrants flowing simultaneously. Industrial and commercial land uses require 6,000 to 9,000 GPM from four to six fire hydrants flowing simultaneously. The maximum distance between hydrants should be 300 feet. As discussed in the Utilities Technical Memorandum, an IFFAR was been obtained from LADWP showing that there are four hydrants in the greater vicinity of the project flowing simultaneously at 6,000 GPM which meets the standard required for the likely highest intensity land use designation (Appendix I).There are currently only 3 hydrants within the immediate vicinity of the Project Site. Therefore, installation of a new additional fire hydrant is expected, which would be installed by the Applicant in conformance with all applicable LAFD and City requirements. The approved IFFAR indicates the availability of enough water service for the anticipated fire-related water demands for the Project (Appendix I).

As discussed in detail in the Utilities Technical Memorandum and water supply impact Threshold 19.b, the Project's water demand is 37,097 gpd, representing a net increase of 34,961 GPD compared to existing conditions (Appendix I). Fire water demands create a much greater immediate impact on the water network than that of the Project's domestic uses, and therefore are the primary means for analyzing infrastructure capacity. As discussed in Subsection 15, Public Services, the approved IFFAR and the City's existing regulatory requirements regarding fire hydrants indicate the availability of sufficient water service for the Project.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to require or result in the construction of new water facilities which could cause significant environmental effects. Therefore, no mitigation measures are applicable. No new or relocated water facilities would be required during Project operation which could cause significant environmental effects, and impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

With respect to water infrastructure, the potential need for future development projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between the development of the Project and other development projects. As discussed above, the Project would have a less than significant impact on water infrastructure. Any upgrades to future development project's water infrastructure would be required to be implemented by the applicants those projects. Therefore, the cumulative impact would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Wastewater

Construction Impacts

The Project would require construction of new wastewater infrastructure to serve the new Eldercare and Childcare Facilities. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. During construction activities, emergency access to the Project Site as well as existing vehicular and non-vehicular traffic flow would be preserved by the construction management plan approved by the City for the Project (see PDF-T-1 in Subsection 17, Transportation). Installation of any required wastewater infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Construction impacts related to wastewater would be less than significant.

Operational Impacts

A Wastewater Service Information (WWSI) was submitted on May 19, 2020 to confirm if the existing wastewater public infrastructure can accommodate the Project. The City of Los Angeles Bureau of Sanitation (BOS) analyzed the Project demands in conjunction with existing conditions and forecasted growth for the Project to discharge wastewater to the existing sewer main/mains in both Wilshire and Ashton. The WWSI was approved on May 27, 2020 and authorized the Project to discharge up to 34,996 gpd to the existing sewer mains. The WWSI also confirmed that the existing half full capacity of the 8-inch sewer line in Wilshire is approximately 0.50 cfs (323,158 gpd) and the existing half full capacity of the 8-inch sewer line in Ashton is 1.47 cfs (950,086 gpd) (Appendix I). As discussed in detail in the Utilities Technical Memorandum, and discussed in Threshold 19.c, the Project's net increase in sewage generation is approximately 33,024 gpd and split to discharge to Wilshire and Ashton equally, 17,470 gpd each (Appendix I). This represents approximately 5.40 percent of the pipe's half full capacity of the 8-inch line in Wilshire and approximately1.86 percent of the pipe's half full capacity of the 8-inch line in Ashton. The existing wastewater infrastructure has adequate capacity to accommodate the Project's wastewater demands (Appendix I). As discussed in detail in the Utilities Technical Memo, and discussed in Threshold 19.c, the Project's proposed wastewater generation would be accommodated by the

Hyperion Water Reclamation Plant, and no new or relocated wastewater facilities would be required to the service the Project (Appendix I).

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to require or result in the construction of new wastewater facilities which could cause significant environmental effects. Therefore, no mitigation measures are applicable. Impacts on local wastewater infrastructure would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

With respect to wastewater infrastructure in the City, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants for future development projects in the City will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Stormwater

Construction Impacts

As discussed in Subsection 9, Hydrology and Water Quality*,* through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on or off-site. No new or relocated stormwater facilities would be required during construction.

Operational Impacts

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation BMP systems which would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, while the Project would not increase impervious surfaces compared to existing conditions, the Low Impact Development (LID) system would capture and use all the rainwater

from the 85th percentile storm. Because existing infrastructure is adequate to handle the Project's stormwater runoff, no new or relocated storm water facilities would be required during operation.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to stormwater drainage facilities. These include Mitigation Measures HYD-1(b) and USS-3(b), listed in detail in Section 3.3 of this SCEA, which identify measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. These measures referenced in HYD-1(b) and USS-3(b) include the following:

- Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.
- Implement Best Management Practices to reduce the peak stormwater runoff from the Project Site to the maximum extent practicable.
- Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
- Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
- Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the Project Site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters.
- Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

Many of the measures identified by Mitigation Measure HYD-1(b) and USS-3(b) align with existing regulatory requirements already included in the Project, such as compliance with the General Construction Permit, MS4 permit, CWA, City stormwater ordinances, etc., related to controlling stormwater runoff. Since no Project level impacts have been identified, and the Project incorporates measures consistent with measures identified by MM-HYD-1(b), impacts will be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA). Development of the Project in conjunction with the related projects would result in an intensification of existing prevailing land uses in an already urbanized area of Los Angeles and could further increase regional demands on stormwater facilities. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities. As discussed earlier,

stormwater on each related Project Site would be collected on their respective site, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first ¾ inches of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, development of the Project and the related projects would not result in cumulative stormwater impacts.

Electric Power

Construction Impacts

The existing power service in the vicinity of the Project Site is supplied by Los Angeles Department of Water and Power (LADWP). Based on substructure review in the Utilities Technical Memorandum (Appendix I), there are existing underground electric lines in the Project vicinity along Wilshire Boulevard. There is also an above ground electrical pole line that supplies electricity to the adjacent residential homes south of the Project.

The Project would require construction of new electrical mains to serve the new buildings and facilities. Construction impacts associated with electrical infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of electrical infrastructure would be limited to on-site electrical distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, as part of the Project, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see PDF-T-1 in Subsection 17, Transportation). Installation of any required electrical infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, Project impacts associated with construction activities would be less than significant.

Operational Impacts

To operate, the Project would require electricity for the Eldercare and Childcare facilities, as well as parking lot lighting. The Project's anticipated electricity use is shown below in Table 4-29.

Table 4-29
Proposed Electricity Demand

Type Description	Electricity Demand (kWh/year)
Eldercare Facility	696,974
Childcare Facility	59,437
Parking with Elevator	457,080
Parking Lot	980
Total	**1,214,471**
Source: Utilities Technical Memorandum, Psomas, April 2019; Appendix I	

The total listed in Table 4-29 does not incorporate the sustainability measures proposed by the Project (such as achieving LEED Silver equivalency), which would further reduce the amount of electricity required for Project operation. Therefore, the total listed is a conservative maximum anticipated for the Project. As discussed in the Utilities Technical Memorandum (Appendix I), a will serve letter dated August 30, 2018 from the LADWP indicated they have sufficient capacity to provide electricity to the Project Site (included as Section 10.0, Appendices, of the Utilities Technical Memorandum). LADWP states that the estimated power requirement for this Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system. As such, impacts would be less than significant.

Regarding mitigation measures included in the 2016-2040 RTP/SCS PEIR MMRP for electricity related impacts, please see discussion in Subsection 6, Energy. Summarized, the Project incorporates regulatory compliance measures and PDF-T-1 that are equal to or more effective than relevant measures under MM-EN-2(b), and impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the Project, in conjunction with the related projects, would increase demands for electrical power. As discussed above, LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the State's energy from renewables by 2030. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of the related projects (and other development in the LADWP service area) could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Nonetheless, the 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Through the SLTRP, the LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Natural Gas

Construction Impacts

The Project would require construction of new natural gas mains to serve the new buildings and facilities. Construction impacts associated with electrical infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of electrical infrastructure would be limited to on-site electrical distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, as part of the Project, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see PDF-T-1 in Subsection 17, Transportation*)*. Installation of any required natural gas infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, Project impacts associated with construction activities would be less than significant.

Operational Impacts

As a public utility, the SoCal Gas is under jurisdiction of the California Public Utilities Commission (CPUC). Title 24 of the California Code of Regulations regulates energy consumption in new constructions. The standards regulate energy consumed in buildings for heating, cooling, ventilation and lighting. Title 24 is implemented through the local plan check and permit process. SoCal Gas' 2018 Gas Report states that residential gas demand is expected to decrease at an annual average rate of 1.4 percent whereas commercial and industrial demand is expected to increase at an annual rate of 0.2 percent. This is mainly due to increased efficiency of power plants and the statewide efforts to use renewable sources of energy for electricity generation.

As discussed in the Utilities Technical Memorandum (Appendix I), from record substructure maps it has been determined that there is one existing six inch gas line beneath Wilshire Boulevard, one four inch gas line beneath Malcolm Avenue, and one three inch gas line beneath Ashton Avenue. The lateral connection size and location for the Project Site are unknown at the moment, however, no upgrades to the gas system are expected (Appendix I). This natural gas connection would be constructed by the utility service provider and follow all appropriate regulatory requirements of such a connection. New laterals to provide natural gas service to the new buildings would be provided in conformance with all applicable SoCal Gas and City requirements. As discussed in the Utilities Technical Memorandum (Appendix I), based on the will serve letter dated December 4, 2017, SoCal Gas has indicated that it has facilities in the area where the Project is being proposed and the gas service would be provided in accordance with the rules and regulations in effect at the time service is provided (included as Section 10.0, Appendices, of the Utilities Technical Memorandum).

Regarding mitigation measures included in the 2016-2040 RTP/SCS PEIR MMRP for natural gas related impacts, please see discussion in Subsection 6, Energy. Summarized, the Project incorporates regulatory compliance and PDF-T-1 that are equal to or more effective than relevant measures under MM-EN-2(b), and impacts related to natural gas service would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the Project, in conjunction with the related projects, would increase demands for natural gas. Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the LA Green Building Code. Similar to the Project, the related projects must also abide by the same statues, regulations, and programs that mandate or encourage energy conservation. SoCal Gas is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SoCal Gas regularly updates its infrastructure reports as required by law. In addition, there is no evidence to suggest that SoCal Gas will not be able to serve its service areas in the coming years as SoCal Gas has determined it can meet projected demand. Therefore, cumulative impacts are less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

Telecommunications

Construction Impacts

The Project would require construction of new telecommunication ducts to serve the new buildings and facilities of the proposed Project. Construction impacts associated with telecommunication infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of telecommunication ducts would be limited to on-site telecommunication distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. During construction activities, emergency access to the Project Site as well as existing vehicular and non-vehicular traffic flow would be preserved by the construction management plan approved by the City for the Project (see PDF-T-1 in Subsection 17, Transportation). Installation of any required wastewater infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, Project impacts on telecommunication facilities associated with construction activities would be less than significant.

Operational Impacts

Based on the will serve letter dated November 20, 2017, Charter Communications has indicated that it has sufficient capacity to provide communications connections to the Project Site. Charter Communications states that it has facilities in the area and would need to extend the plant from the existing aerial poles and underground facilities to the Project Site and that they may require a non-exclusive access agreement from the Project owners to be completed prior to providing design and engineering for the Project connection. The connection would be provided in accordance with the rules and regulations in effect at the time service is provided.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to result in environmental impacts from the construction or relocation of

telecommunication facilities. Therefore, no mitigation measures are applicable. Impacts related to telecommunications infrastructure would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

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

Less Than Significant Impact. The LADWP supplies water to the Project Site. Water would be conveyed to the Site via an existing 12-inch water main beneath Wilshire Blvd, a six-inch water main beneath Ashton Avenue, and a six-inch water main beneath Malcolm Avenue. The LADWP Urban Water Management Plan (UWMP) provides historical and forecasted water demands for the City of Los Angles. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economically activity. Table 4-30, Historical Water Demand for LADWP's Service Area, shows the previous breakdown of average water use from 2001.

Table 4-30
Historical Water Demand for LADWP's Service Area

Fiscal Year Ending Average	Single Family		Multi-Family		Commercial		Industrial		Government		Non-Revenue		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2011-2014	209,651	37%	165,364	29%	98,994	17%	17,663	3%	42,543	8%	32,774	6%	566,990
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33,696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
24-Year Average	221,126	36%	181,042	30%	107,484	18%	21,533	4%	41,047	7%	39,100	6%	611,331

Source: LADWP, 2015 Urban Water Management Plan (UWMP), Exhibit ES-F.

By analyzing historical demand, LADWP has forecasted water supply and demand projections five-year increments for each of the major categories of water uses. The point of forecasting water demand is to allow LADWP to better understand trends in water use, develop effective conservation programs, and invest appropriately in water supply development projects.

LADWP anticipates that through various measures, such as conservation and rebalancing the proportions of existing and future water supply sources, adequate water supplies will be available even in the multi-dry year scenario. As shown in Table 4-31, Multiple Dry Years Water Supply and Demand, adequate water supplies would be available under multi-dry year conditions through the year 2040.

Table 4-31
Multiple Dry Years Water Supply and Demand

	2020	2025	2030	2035	2040
Total Demand (AFY)	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
Supply (AFY)					
Existing/Planned	323,470	369,470	380,470	396,670	398,970
MWD Water Purchases	318,930	307,430	305,030	298,230	310,530
Total Supply	**642,400**	**676,900**	**685,500**	**694,900**	**709,500**
Source: LADWP, 2015 Urban Water Management Plan (UWMP), Exhibit 11G.					

There are existing uses on the Project Site which currently utilize water resources.[111] LADWP calculates anticipated water demand using the City of Los Angeles Bureau of Sanitation's approved sewer generation rates. Table 4-32 shows the existing water demands from the existing uses on the Project Site, proposed water demand from the proposed Project, and the net increase anticipated. As shown in Table 4-32, the existing uses on the Project Site currently demand 2,136 gallons per day.

[111] *Wastewater generation factors do not take into consideration current Title 24 water reduction requirements, and therefore can overstate water demand by up to approximately 20 percent.*

Table 4-32
Existing and Proposed Water Demand

Land Use Type	Average Daily Flow Factors[1]	Number of Units	Average Daily Flow
Proposed Uses			
Residential Apt. (1-Bedroom)	110 GPD	40 DU	4,400
Residential Apt. (2-Bedroom)	150 GPD	13 DU	1,950
Rest Home	70 GPD	123 Beds	8,610
Dining/Kitchen	300 GPD/1,000 SF	8,488 SF	2,546
Beauty Parlor	425 GPD/1,000 SF	724 SF	308
Lounge	50 GPD/1,000 SF	8,072 SF	404
Library	50 GPD/1,000 SF	801 SF	40
Theater Room	3 GPD	33 Seats	99
Health Club	600 GPD/1,000 SF	1,082 SF	650
School: Nursery/Daycare	9 GPD	105 Children	945
Office/Administrative Space	120 GPD/1,000 SF	2,134 SF	281
Church: Sanctuary	3 GPD	210 Seats	630
Church: Fellowship Hall	3 GPD	151 Seats	453
Pool[2]	13,651 GPD	1 Pool	13,651
Irrigation	10 %	--	2,131
Subtotal Proposed Project	--	--	**37,097**
Existing Uses			
Residential Apt. (2-Bedroom)	185 GPD	1 DU	185
Church: Sanctuary	3 GPD	210 Seats	630
Church: Fellowship Hall	3 GPD	120 Seats	360
Office/Administrative Space	120/1000 SF	392 SF	47
School: Nursery/Daycare	9 GPD	80 Children	720
Irrigation	10 %	--	194
Subtotal Existing Uses	--	--	**2,136**
Net Total (Proposed – Existing)	--	--	**34,961**

[1] Average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012
Gpd – gallons per day; du – dwelling unit; sf – square feet; % - percent
[2] A depth of 5' was assumed in order to calculate the GPD of the pool. The latest architectural plans provide a surface area of 365 SF. The daily pool discharge is conservatively assumed in order to calculate the maximum discharge that will enter the water network within a 24-hour period
Source: Utilities Technical Memorandum, Psomas, 2020 (Appendix I).

As shown in Table 4-32, at buildout the Project's gross water demand would be approximately 37,097 gallons per day. The Project would result in an estimated net increase in water demand of approximately 34,961 gpd (after accounting for the removal of existing uses), which would comprise a very small fraction of the City's water demand. Moreover, the Project's population and employment increases are consistent with SCAG growth projections. Therefore, the population increase (and water demand increase) associated with the Project has been accounted for in the

UWMP. In addition, the proposed Project would be required to comply with all existing and future restrictions on water use that the City implements. As such, sufficient water supplies are available to serve the Project Site during normal, dry, and multiple-dry years, and impacts would be less than significant.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to water supplies. These include Mitigation Measure USS-4(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. These measures referenced in USS-4(b) include the following:

- Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair
- Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.

As described in the impact analysis above, available water resources are available to serve the Project, and no impacts regarding water supply are anticipated to occur. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code. Therefore, although the measures included in Mitigation Measure USS-4(b) are not applicable to the Project, the Project is consistent with applicable water reduction measures and impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the Project in combination with the related projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2015 UWMP. The 2015 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2040 (the planning horizon required of 2015 UWMPs) under wet and dry year scenarios. The Project would be consistent with the General Plan and the site's Community Plan land use designation, and therefore, has been taken into account in the 2015 UWMP. It is unknown whether or not the related projects or other developments in the LADWP service area have been taken into account in the 2015 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2015 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (pursuant to SB 610) to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, the cumulative impact would be less than significant.

With respect to water treatment facilities, the LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[112] Therefore, the LAAFP would have adequate capacity to serve the additional water demanded by the Project (which would consume 34,961 gpd) and the related projects.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact.

Construction Impacts

Construction activities for the Project would not result in wastewater generation as construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the local wastewater system. Thus, wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows and construction impacts to the wastewater system would be less than significant.

Operational Impacts

The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. The Project Site lies within the Hyperion Sanitary Sewer System. In February 2017, a Sewer System Management Plan (SSMP) was prepared for the Hyperion Sanitary Sewer System in accordance with WDRs adopted by the SWRCB on May 2, 2006.

The LAMC includes regulations that allow the City to assure available sewer capacity for new Projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Availability Request (SCAR) when any person seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

An alternative capacity availability study can be performed which verifies the sewer capacity of the adjacent sewer mains through a process run by the Bureau of Sanitation called the Wastewater Services Information (WWSI) request (Appendix I). This preliminary evaluation reviews potential impacts to the wastewater system for the project in the same manner as the SCAR would but does not expire. As stated in the WWSI, the evaluation would determine cumulative impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops (Appendix I).

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[112] *Better Buildings, U.S. Department of Energy, Showcase Project: Los Angeles Aqueduct Filtration Plant Modernization-Oxygen Plant Replacement, website: https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization-%E2%80%93-oxygen-plant-replacement, accessed: August 2019.*

LAMC Section 64.11.2 requires the payment of fees for new connections to the sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use.

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. S006-0691). Per this Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.

In 2006 the City approved the Integrated Resources Plan, which incorporates a Wastewater Facilities Plan. The Integrated Resources Program was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. To meet future demands posed by increased wastewater generation, the City has chosen to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation, and other approved uses. The City has published the One Water Los Angeles 2040 Plan, which builds on the premise of the Integrated Resources Plan to maximize water resources and to develop a framework for managing the City's watersheds, water resources, and water facilities and ensure sufficient wastewater infrastructure capacity through 2040. As with the Integrated Resources Plan, such efforts would be organized in three phases over a 23- year period from 2018 to the planning horizon of 2040. The "Near-term" phase will be 2018-2020, the "Mid-term" phase will be 2021-2030, and the "Long-term" phase will be 2031-2040. The phasing plan will comprise of 35 integration opportunities that will demonstrate how water management benefits can be integrated in a project through multiagency collaboration. The One Water Los Angeles 2040 Plan is currently in the "Near-term" phase.

There is an existing eight-inch public sewer main beneath Wilshire Boulevard, and an eight-inch sewer main beneath Ashton Avenue. A Water Resources Technical Report and Utilities Technical Memorandum were prepared for the Project in April 2019, and are included as Appendix H and Appendix I, respectively. As analyzed in the Utilities Technical Memorandum, and shown in Table 4-33 the existing developments on the Project Site currently generate 1,942 gpd (see Appendix I).

Table 4-33
Existing and Proposed Wastewater Generation

Land Use Type	Average Daily Flow Factors[1]	Number of Units	Average Daily Flow
Proposed Uses			
Residential Apt. (1-Bedroom)	110 GPD	40 DU	4,400
Residential Apt. (2-Bedroom)	150 GPD	13 DU	1,950
Rest Home	70 GPD	123 Beds	8,610
Dining/Kitchen	300 GPD/1,000 SF	8,488 SF	2,546
Beauty Parlor	425 GPD/1,000 SF	724 SF	308
Lounge	50 GPD/1,000 SF	8,072 SF	404
Library	50 GPD/1,000 SF	801 SF	40
Theater Room	3 GPD	33 Seats	99
Health Club	600 GPD/1,000 SF	1,082 SF	650
Pool[2]	13,651 GPD	1 Pool	13,651
School: Nursery/Daycare	9 GPD	105 Children	945
Office/Administrative Space	120 GPD/1,000 SF	2,134 SF	281
Church: Sanctuary	3 GPD	210 Seats	630
Church: Fellowship Hall	3 GPD	151 Seats	453
Subtotal Proposed Project	--	--	**34,966**
Existing Uses			
Residential Apt. (2-Bedroom)	185 GPD	1 DU	185
Church: Sanctuary	3 GPD	210 Seats	630
Church: Fellowship Hall	3 GPD	120 Seats	360
Office/Administrative Space	120/1000 SF	392 SF	47
School: Nursery/Daycare	9 GPD	80 Children	720
Subtotal Existing Uses	--	--	**1,942**
Net Total (Proposed – Existing)	--	--	**33,024**

[1] Average daily flow based on City of Los Angeles' sewer generation factors dated April 6, 2012
[2] A depth of 5' was assumed in order to calculate the GPD of the pool. The latest architectural plans provide a surface area of 365 SF. The daily pool discharge is conservatively assumed in order to calculate the maximum discharge that will enter the water network within a 24-hour period
Source: Utilities Technical Memorandum, Psomas, 2020 (Appendix I).

As shown in Table 4-33, the net increase in sewer demand for the Project is 33,024 gpd. As a result of this sewer demand, the Project would require multiple eight-inch sewer laterals to connect to main lines in the street. A Wastewater Service Information (WWSI) was requested from the City of Los Angeles Bureau of Sanitation (BOS) for a split discharge with 50 percent of the Project sewer flowing to Wilshire Blvd and 50 percent of the Project sewer flowing to Ashton Avenue. A WWSI was approved on May 27, 2020 for the Project demand of 34,966 gpd. The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Water Reclamation Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation

Plant). On average 275 million gallons of wastewater enters the Hyperion Water Reclamation Plant on a dry weather day. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons of water per day (mgd) and peak wet weather flow of 800 mgd.[113] Based on the above, the Hyperion Water Reclamation Plant has approximately 175 mgd of available daily capacity and the Project's anticipated wastewater demands are less than one percent.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to constrain existing wastewater service providers. Therefore, no mitigation measures are applicable. The Project would not generate wastewater demands that would constrain existing wastewater service providers and impacts to wastewater facilities would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP treats an average daily flow of 275 mgd on a dry weather day, and has capacity to treat 450 mgd.[114] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (33,024 gpd or less than one percent of available capacity) and future development projects within the HTP service area.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The management of solid waste in the City of Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles has enacted numerous waste reduction and recycling programs in order to comply with the California Integrated Waste Management Act (AB 939), which required every city in California to divert at least 50 percent of its annual waste by the year 2000, and be consistent with AB 341, which sets a 75 percent recycling goal for California by 2020. As tracked by the City's Zero Waste Progress Report, the City achieved a landfill diversion rate of 76.4 percent as of 2012.[115] The City of Los Angeles has also prepared a Solid Waste Management Policy Plan (CiSWMPP), which contains long-term goals, objectives and policies for solid waste management for the City. It specifies that

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[113] *City of Los Angeles. 2020. Hyperion Treatment Plant – Treatment Process. 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?_adf.ctrl-state=r9sg39yd8_82&_afrLoop=11716998548146573#!. Accessed June 2020.*

[114] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed: August 2019.*

[115] *City of Los Angeles Sanitation. 2013. Zero Waste Progress Report. March 2013. Accessible at: https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf*

the City's Zero Waste goal is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025.[116]

With regard to the Project, the handling of all debris and waste generated during construction would be subject to the State's requirements under the California Integrated Waste Management Act AB 939 for salvaging, recycling, and reuse of materials from construction activity on the Project Site. The Project has two components (construction and operation) that would result in the generation of solid waste. Construction of the Project would also involve site preparation activities that would generate waste materials; however, construction would be temporary. In addition, the Project would be required to comply with the City's Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste generated by the Project would be required to be taken to a certified C&D waste processor. Many certified waste processors are located within with the City of Los Angeles. The processor closest to the Project Site is Downtown Diversion/USA Waste of California, located approximately 14.2 miles east of the Project Site at 2424 East Olympic Boulevard, which has a recycling rate of 82.82 percent as of 2020. The estimated Project demolition and construction waste generation is shown in Table 4-34.

Table 4-34
Estimated Project Demolition and Construction Waste Generation

Land Use Type	Size	Generation Rate (lbs/sf)[1]	Total (tons)
Construction Waste			
Residential (176 Units)[2]	176,580 sf	4.38	387
Institutional/Commercial	19,703 sf	3.89	38
Subtotal			**425**
Demolition Waste			
Existing Church/School	8,750	115	503
Single-Family Residence	3,347	155	259
Subtotal			**762**
Total for Construction and Demolition			**1,187**
Total After 75-Percent Recycling[3]			**297**

sf – square feet
[1] Generation rates provided by the Characterization of Building-Related Construction And Demolition Debris in the United States, EPA 1998
[2] Construction of the Eldercare Facility has been conservatively analyzed as all residential, despite other uses included in the building. The generation rate of 4.38 lbs/sf is conservative as non-residential generation rates are lower (3.89 lbs/sf)
[3] Although actual diversion rates may be hire, conservatively estimated per SB 1374, requiring a minimum of 75 percent.

As shown in Table 4-34, after accounting for mandatory recycling, the Project would generate approximately 297 tons of construction and demolition waste. The landfills serving the Project Site

[116] *Los Angeles Bureau of Sanitation (LASAN). 2013. City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan. https://www.lacitysan.org/san/sandocview?docname=cnt012522*

have a remaining daily capacity of 8,750 tons per day and would have sufficient capacity to accommodate the Project's construction waste (remaining capacities shown in Table 4-36).

The Project's estimated operational solid waste is shown in Table 4-35. Because there are existing operational uses on-site, existing solid waste generation was subtracted from the proposed, to illustrate the net total.

Table 4-35
Estimated Solid Waste Generation

Land Use Type	Size	Rate[1]	Total (tons/day)
Proposed Uses			
Eldercare Facility	252 Residents	5 lbs/person/day	0.630
Childcare Facility	21 Employees	3.55 lbs/emp/day	0.038
Subtotal Proposed Project			0.668
Existing Uses			
Single Family Housing	1	12 lbs/house/day	0.006
Day-Care Center	14 Employees	3.55 lbs/emp/day	0.025
Subtotal Existing			0.031
Net Total (Proposed – Existing)			**0.637**

[1] Generation rates based on Residential and Institutional sector establishments provided by CalRecycle's Estimated Solid Waste Generation Rates

As shown in Table 4-35, the Project would generate a net increase of approximately 0.637 tons per day or 233 tons per year. This estimate is conservative since it does not factor in any recycling or waste diversion programs.

LASAN manages solid waste collection in the City. Table 4-36 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for landfills and waste facilities in the vicinity of the Project Site. The landfills and facilities evaluated include Calabasas Landfill, Sunshine Canyon Landfill, Commerce Refuse-To-Energy Facility and the Southeast Resource Recovery Facility. These landfills and facilities that may serve the Project Site have an estimated remaining daily capacity of 8,750 tons per day. The Project's anticipated 0.637 tons per day would be approximately 0.007 percent of the estimated remaining daily capacity of solid waste facilities currently serving the area.

Table 4-36
Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons/day)	Average Daily Waste Quantities Disposed (tons/day)	Estimated Remaining Daily Capacity (tons/day)[1]	Estimated Remaining Permitted Capacity (million tons)	Estimated Closure Date
Calabasas Landfill	3,500	951	2,549	5.95	2036
Sunshine Canyon Landfill	12,100	7,496	4,604	62.12	2037
Commerce Refuse-To-Energy Facility	1,000	299	701	N/A	N/A
Southeast Resource Recovery Facility	2,240	1,344	896	N/A	N/A
Total	**18,840**	**10,090**	**8,750**	**68.07**	**–**

N/A = not available

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

Sources: Los Angeles County 2017, CalRecycle 2018

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to available capacities for solid waste disposal. These include Mitigation Measures USS-6(b), listed in detail in Section 3.3 of this SCEA, which identify measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Many of these measures identified by Mitigation Measure USS-6(b) align with existing regulatory requirements already included in the Project, including re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Further, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific impacts related to solid waste would occur. Since the Project would not have the potential to generate solid waste in excess of State or local standards, and incorporates regulatory compliance measures that are consistent with applicable solid waste reduction measures under MM-USS-6(b), impacts would be less than significant.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Implementation of the Project in combination with the related projects and other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and other development projects generate C&D waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-

certified C&D waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert C&D waste from landfills. The City is most commonly served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including C&D waste. As of 2017 the Sunshine Canyon Landfill permits a daily intake of 12,100 tons, and has a remaining capacity of 68.0 million tons.[117] Thus, this landfill would be expected to have sufficient capacity to accommodate cumulative demand.

Operation of the Project in conjunction with the related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2017 Annual Report (published April 2019 and the most recent available) projects waste generation and available landfill capacity through 2032.[118] Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for the Project and related projects. Therefore, the cumulative impacts from solid waste would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact could occur if the Project would conflict with any statutes and regulations governing solid waste. The Los Angeles Bureau of Sanitation and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the Project Site. The entire Southern California region is served by an extensive network of landfills and other waste disposal methods. In compliance with State legislation, the Project would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Project from the applicable landfill site. The Project would comply with federal, state, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), the Solid Waste Management Policy Plan, and the City's recycling program.

The 2016-2040 RTP/SCS PEIR MMRP did not identify any mitigation measures regarding a project's potential to conflict with solid waste requirements. Therefore, no mitigation measures are applicable. As discussed in the impact analysis above, because the Project would comply with all applicable federal, State, and local regulations involving solid waste disposal, the Project would have a less than significant impact.

Cumulative Impacts

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Like the Project, the related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed

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[117] *Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2017 Annual Report, published April 2019,, website: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF, accessed: August 2019.*

[118] *Ibid.*

components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the Project would be required to comply with all federal, State, and local regulations including the City's Green Building Code and the SWIRP. Therefore, Project's contribution to cumulative impacts would not be cumulatively considerable.

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4.20 WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form 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?	☐	☐	☐	☒

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is in an established urban area in the Wilshire-Westwood area of the City of Los Angeles. As discussed in Subsection 9, Hazards and Hazardous Materials, under Threshold 9.f, the nearest designated disaster routes are Sepulveda Boulevard (north and south of Wilshire), and Wilshire Boulevard (west of Sepulveda), approximately a half mile west of the Project Site.[119] The surrounding area has long been urbanized and is developed with a variety of higher-density single- and multi-family residential and commercial uses. The Project Site is not located in or near any state responsibility areas and is not classified as a Very High Fire Hazard Severity Zone.[120,121]

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental

[119] *City of Los Angeles – West Area. Disaster Routes Map. 2008. Accessible at: https://dpw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20West%20Area.pdf*

[120] *Department of City Planning. Zone Information and Map Access System (ZIMAS). Available at: http://zimas.lacity.org/*

[121] *CalFire. Very High Fire Hazard Severity Zones (VHFHSZ) in State and Local Responsibility Areas. Accessible at: https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/*

impacts pertaining to wildfires[122]. These include Mitigation Measure HAZ-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As described in the impact analysis above, the Project Site is not located in an area with classified as a very high fire hazard severity zone and would not exacerbate fire risks. Therefore, the measures included in MM-HAZ-8(b) are not applicable to the Project and there would be no impact on any adopted emergency response plans or emergency evacuation plans pertaining to wildfire hazards.

See discussions in Subsection 9, Hazards and Hazardous Materials, Subsection 15, Public Services, and Subsection 19, Utilities and Service Systems, for discussions related to general emergency response and fire protection.

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

No Impact. The Project Site is in an established urban area in the Wilshire-Westwood area of the City of Los Angeles. The surrounding area has long been urbanized and is developed with a variety of higher-density single- and multi-family residential and commercial uses. The Project Site is not located in or near any state responsibility areas and is not classified as a very high fire hazard severity zone. Because the Project Site is not located in a wildfire severity zone, the project would not exacerbate wildfire risks, and would not expose future residents to pollutant concentrations from a wildfire or potentially contribute to the risk of an uncontrolled spread of wildfire.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to wildfire hazards. These include Mitigation Measure HAZ-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As described in the impact analysis above, the Project Site is not located in an area with classified as a very high fire hazard severity zone and would not exacerbate fire risks. Therefore, the measures included in MM-HAZ-1(b) are not applicable to the Project, and no impact would occur.

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

No Impact. The Project Site is in an established urban area in the Wilshire-Westwood area of the City of Los Angeles. The surrounding area has long been urbanized and is developed with a variety of higher-density single- and multi-family residential and commercial uses. The Project Site is not located in or near any state responsibility areas and is not classified as a very high fire hazard severity zone. There are no installation or maintenance of infrastructure activities

[122] *An explicit standalone wildfire section was not included in the 2016-2040 RTP/SCS PEIR, as the Wildfire section was added to the CEQA Appendix G Guidelines in 2019. This discussion focuses on wildfire impacts identified and discussed in the hazards and hazardous materials discussion of the PEIR.*

associated with the project that have the potential to exacerbate fire risk. The Project Site is currently 95 percent imperious and developed.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to wildfire hazards. These include Mitigation Measure HAZ-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As described in the impact analysis above, the Project Site is not located in an area with classified as a very high fire hazard severity zone and would not require installation or maintenance of new infrastructure that could exacerbate fire risks. Therefore, the measures included in MM-HAZ-1(b) are not applicable to the Project, and no impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

No Impact. The Project Site is relatively flat, entirely paved and developed with existing buildings and is in an established urban area in the Wilshire-Westwood area of the City of Los Angeles. The surrounding area has long been urbanized and is developed with a variety of higher-density single- and multi-family residential and commercial uses. The Project Site is not located in or near any state responsibility areas and is not classified as a very high fire hazard severity zone.

The 2016-2040 RTP/SCS PEIR MMRP contains mitigation measures that are to be applied if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to wildfire hazards. These include Mitigation Measure HAZ-8(b), listed in detail in Section 3.3 of this SCEA, which identifies measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. As described in the impact analysis above, the Project Site is not located in an area with classified as a very high fire hazard severity zone and would not expose people or structures to significant secondary hazards or risks resulting from wildfires. Therefore, the measures included in MM-HAZ-1(b) are not applicable to the Project, and no impact would occur.

Cumulative Impacts

No Impact. As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

The related projects are all located highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. As with the proposed Project, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. The Project, and all related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no impact.

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4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant with Mitigation Incorporated. Based on the analysis contained in Subsections 1 through 20, above, and with implementation of regulatory compliance, project design features, and Project-specific mitigation measures, the Project would not have the potential to degrade the quality of the environment. Based on the analysis in Subsection 4, Biological Resources, the Project would not have the potential to 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 reduce the number or restrict the range of a rare or endangered plant or animal. Based on the analysis in Subsections 5 (Cultural Resources) and 7 (Geology and Soils), with implementation of Project-specific Mitigation Measures MM-CR-1 and MM-GEO-1 regarding the potential inadvertent discovery of archaeological or paleontological resources, which are equal to or more effective than relevant measures under SCAG RTP/SCS PEIR MM-CUL-2(b), the Project does not have the potential to 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)?

Less Than Significant Impact. Cumulative impacts are defined as two or more individual (and potentially less than significant) Project effects that, when considered together or in concert with other projects, combine to result in a significant impact within an identified geographic area.

As discussed in Section 2.0, Subsection 2.8, the cumulative analysis in this SCEA conservatively takes into consideration the 29 related projects within 1.5 miles of the Project site (shown in Figure 2-13 and included in Table 6-1 in Appendix K-2 of this SCEA).

Individual cumulative analyses are contained throughout Subsections 1 through 20, above. As discussed in each section, cumulative impacts related to all of the above environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. In general, impacts to human beings are associated with such issues as air quality, hazards and hazardous materials, and noise impacts.

As detailed in Subsection 3, Air Quality, through compliance with applicable air quality regulatory requirements that are consistent with the measures identified by SCAG RTP/SCS PEIR MMRP Mitigation Measure AIR-2(b), the Project would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As discussed in Subsection 9, Hazards and Hazardous Materials, demolition of existing structures on-site may have the potential to expose persons to potential ACM or lead based paint. SCAG Mitigation Measure HAZ-4(b), listed in detail in Section 3.3 of this SCEA, identifies measures capable of avoiding or reducing the significant effects related to a project located on a hazardous materials site. As discussed in detail in Subsection 9, Hazards and Hazardous Materials, a Phase I ESA was prepared, and confirmed that the Project Site is not identified as a hazardous materials site, and Project Design Features PDF-HAZ-1 and PDF-HAZ-2 would be implemented as part of the Project, which are equal to or more effective than relevant measures under MM-HAZ-4(b) as they are site-specific measures to ensure compliance with all applicable state and local regulatory requirements pertaining to the removal and abatement of ACM and lead based paint. With implementation of these project design features and associated regulatory compliance, potential impacts pertaining to hazardous material would be less than significant.

As discussed in Subsection 13, Noise, construction activity would create potentially significant noise impacts on neighboring properties. SCAG RTP/SCS PEIR Mitigation Measure NOISE-1(b), listed in detail in Section 3.3 of this SCEA, identifies measures capable of avoiding or reducing the significant effects of noise impacts. As discussed in detail in Subsection 13, Noise, Project-level mitigation measures MM-N-1 through MM-N-7 and project design features PDF-N-1 through PDF-N-4 have been devised, which are equal to or more effective than relevant measures under MM-NOISE-1(b) as they reflect site- and Project-specific technical analyses of proposed Project-

related noise sources and nearby noise-sensitive uses. With implementation of mitigation measures, project design features, and regulatory compliance, construction and operational noise levels will be less than significant.

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