City of Los Angeles

Department of City Planning

200 N. Spring Street, Suite 721 • Los Angeles, CA 90012

Sustainable Communities Environmental Assessment

3401 South La Cienega Boulevard Mixed-Use Project

WEST ADAMS-BALDWIN HILLS-
LEIMERT COMMUNITY PLAN AREA
Case Number: ENV-2021-6879-SCEA

Project Location: 3401 South La Cienega Boulevard, Los Angeles, CA 90016

Council District: 10—Ridley-Thomas

Project Description: The Project includes a new 460,824 square-foot mixed-use residential and commercial development, including one Residential Building and one Commercial Building on a site totaling approximately 3.59 acres. The approximately 230,412 square-foot Residential Building contains 260 residential units for rent; 22 units are reserved for “very low income” households and 7 units are reserved for workforce housing within a 149’-6”-tall Residential building up to 13 stories high on the western portion of the Project Site. The approximately 230,412 square-foot Commercial Building includes 2,869 square-feet of ground floor retail within a 92-foot-tall Commercial Building (office and ground floor retail) up to six stories high on the eastern end of the Project Site. The Project proposes up to 785 parking spaces, including 130 residential and 242 commercial parking spaces. The 413 remaining spaces would be unassigned and available for residential or commercial uses.

The applicant is requesting approval of the following discretionary entitlements, reviews, and approvals required for implementation of the Proposed Project: a density bonus to permit a mixed-use development project; a vesting tentative tract map to divide the parcel into five lots; a site plan review to permit the construction, use, and maintenance of more than 50 new residential units and more than 50,000 square feet of non-residential floor area; a conditional use permit to allow an alcoholic establishment; and a Community Plan Implementation Overlay (CPIO) administrative clearance for compliance with all applicable provisions of the CPIO.

Public Review: A 30-day review period will begin on January 13, 2022, and end on February14, 2022. Any interested person or agency may comment on this matter by submitting commentsto Kyle Winston via email at kyle.winston@lacity.org; or by mail to 221 N. Figueroa Street,Suite 1350, Los Angeles, CA 90012.

APPLICANT:	ON BEHALF OF:
La Cienega Owner LLC	City of Los Angeles Department of City Planning West/South Project Planning

January 2022

DRAFT SCEA

3401 South La Cienega Boulevard Mixed-Use Project
City of Los Angeles

PREPARED FOR:

City of Los Angeles
Department of City Planning
West/South Project Planning
200 N. Spring Street, Suite 721
Los Angeles, CA 90012

PREPARED BY:

Impact Sciences, Inc.
811 W. 7th Street, Suite 200
Los Angeles, California 90017

IMPACT SCIENCES

January 2022

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I. INTRODUCTION

A. PURPOSE OF A SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

The purpose of this Sustainable Communities Environmental Assessment (SCEA) is to evaluate the environmental effects of the proposed 3401 South La Cienega Project (Proposed Project) in accordance with the California Environmental Quality Act (CEQA). In addition, the SCEA evaluates the Proposed Project's consistency with the Southern California Association of Government's (SCAG's) Connect SoCal 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (2020-2045 RTP/SCS) adopted in September 2020, and incorporates the feasible mitigation measures, performance standards, and/or criteria from the West Adams – Baldwin Hills – Leimert Park Community Plan Environmental Impact Report (EIR) into the Proposed Project.

The SCEA form of CEQA documentation was established by Senate Bill 375 (SB 375) to provide streamlined environmental review for certain "Transit Priority Projects." SB 375 (Public Resources Code [PRC] § 21155[b]) defines Transit Priority Projects (TPPs) as projects that shall:

> (1) contain at least 50% residential use, based on total building square footage and, if the project contains between 26% and 50% nonresidential uses, a floor area ratio of not less than 0.75;
>
> (2) provide a minimum net density of at least 20 dwelling units per acre; and
>
> (3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is defined in § 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25% of their area farther than one-half mile from the stop or corridor and if not more than 10% of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.

See **Chapter III, SCEA Assessment Eligibility,** for a discussion of the Proposed Project's consistency with the criteria listed above.

The intent of the CEQA streamlining provisions is not to undercut or circumvent CEQA requirements, but rather to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce greenhouse gas (GHG) emissions by integrating transportation and land use planning.

A SCEA is comparable to an Initial Study / Mitigated Negative Declaration (IS/MND) since the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a level of insignificance. However, unlike a IS/MND, the SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior environmental review, in this case the SCAG Connect SoCal RTP/SCS EIR, certified in May 2020, and the West Adams – Baldwin Hills – Leimert Community Plan EIR, which was certified in May 2016.[1] Also, growth-inducing impacts are not required to be referenced, described, or addressed and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network need not be referenced, described, or discussed.

B. PROJECT SUMMARY

La Cienega Owner LLC (Applicant) proposes to develop the Proposed Project on an approximately 153,608 square foot (3.53 acre) site (Project Site) located within the West Adams-Baldwin Hills-Leimert Community Plan Area within the City of Los Angeles. The Proposed Project is located at 3401 South La Cienega Boulevard Assessor's Parcel Number (APN) 420-503-2001.

The Project Site is bound by the Los Angeles County Metropolitan Transportation Authority Metro E Line (Expo) to the north and existing office buildings and open space to the west. South La Cienega Boulevard lies to the east of the Project Site. Corbett Street and the single-story See's Candies factory lies directly to the south. The Project Site is currently improved with a self-storage facility and associated surface parking. The Proposed Project would demolish the existing structures.

1 SCAG Connect SoCal RTP/SCS Program EIR available at: https://scag.ca.gov/peir
West Adams – Baldwin Hills – Leimert Community Plan EIR available at:
https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html

The Project proposes a new 460,824 square-foot (sf) mixed-use residential and commercial development, including one residential building and one commercial building. The approximately 230,412 sf residential building contains 260 residential rental units; 22 units of which are reserved for very low-income households, and 7 units of which are reserved for workforce housing. The approximately 230,412 sf commercial building includes 2,869 sf of ground floor retail. The Proposed Project's residential building and commercial building would be 149' 6" and 92' in height, respectively. The residential building would include 26 studio units, 143 one-bedroom units, 78 two-bedroom units, and 13 three-bedroom units with affordable units mixed among them.

Up to 785 parking spaces would be provided in two levels of subterranean parking, including EV parking. In accordance with the Los Angeles Municipal Code (LAMC), the Proposed Project would provide 222 bicycle spaces in the structure parking (36 short term bicycle spaces and 186 long-term bicycle spaces).

Open space areas and amenities for residents include an outdoor wellness garden, outdoor lounge and barbeque area, pool, and spa. The Proposed Project also proposes 34,214 sf of publicly accessible open space on the ground.

C. STATUTORY BACKGROUND

The Sustainable Communities and Climate Protection Act of 2008 amended the CEQA regulations to add Chapter 4.2, Implementation of the Sustainable Communities Strategy (PRC § 21155), which provides a CEQA exemption for Sustainable Community Projects and streamlined CEQA analysis for TPPs.

One such streamlining provision is the SCEA, the provisions of which are specified primarily in PRC § 21155.2. Section 21155.2(a) states that if a TPP incorporates all feasible mitigation measures, performance standards, or criteria set forth in prior applicable environmental impact reports and adopted findings made pursuant to PRC § 21081, then a TPP shall be eligible for a SCEA. For a detailed analysis of the Proposed Project's compliance with SCEA statutory requirements, see **Chapter III, SCEA Eligibility**, section of this document.

D. ORGANIZATION OF THE SCEA

This SCEA is organized into seven sections as follows:

I. **Introduction.** This section (above) provides introductory information summarizing the key elements of the Sustainable Communities and Climate Protection Act and the associated SCEA, as well as information about the Proposed Project.

II. **Project Description.** This section contains a detailed project description, contact information, existing and proposed general plan land use and zoning information, description of surrounding land uses, project objectives, and a summary of required approvals.

III. **SCEA Eligibility.** This section analyzes the Proposed Project's consistency with the TPP Criteria and SCAG's Connect SoCal (2020-2045 RTP/SCS) goals and policies and identifies applicable mitigation measures from previously prepared and certified EIRs.

IV. **SCEA Checklist.** This section contains the completed SCEA Checklist showing the significance level under each environmental impact category. Each environmental issue identified in the SCEA Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, mitigation measures are provided to reduce such impacts to a less than significant level.

V. **List of Preparers.** This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

VI. **References.** This section provides references for the sources of information cited in the SCEA.

VII. **Appendices.** Includes various documents, technical reports, and information used in the SCEA.

II. PROJECT DESCRIPTION

A. Introduction

La Cienega Owner LLC (Applicant) proposes to develop the approximately 153,608 square-foot (3.53 acre) site (Project Site) located within the West Adams-Baldwin Hills-Leimert Community Plan Area within the City of Los Angeles. The Proposed Project is located at 3401 South La Cienega Boulevard, Los Angeles, California 90016, Assessor's Parcel Number (APN) 4205-032-001.

The Project proposes a new 460,824 sf mixed-use residential and commercial development, including one Residential Building and one Commercial Building. The approximately 230,412 sf Residential Building contains 260 residential units for rent; 22 units are reserved for "very low income" households and 7 units are reserved for workforce housing. The approximately 230,412 sf Commercial Building includes 2,869 sf of ground floor retail. Currently, the Project Site contains nine single-story masonry structures that serve as a self-storage facility, which the Applicant proposes to demolish to construct the Proposed Project.

The Project Site is centrally located in the West Adams neighborhood at the intersection of South La Cienega Boulevard and Jefferson Boulevard, adjacent to the Metro E (Expo) Line tracks along Jefferson Boulevard and the La Cienega / Jefferson Metro Station.

The Project proposes up to 785 parking spaces, including 130 residential and 242 commercial parking spaces. The 413 remaining spaces would be unassigned and available for residential or commercial uses. Most of the spaces would be provided in a two-level subterranean parking structure with the at-grade parking screened from public view. The Proposed Project would provide 222 bicycle spaces in the underground structure (36 short term bicycle spaces and 186 long-term bicycle spaces).

Open space areas and amenities would be provided for residents including an outdoor wellness garden, lounge, barbeque area, pool, and spa. Approximately 34,214 sf of publicly accessible open space would be provided on the ground floor.

B. Project Location And Surrounding Uses

The Project Site is a flag shaped lot bound by a Metro owned right-of-way for the E Line and a bicycle path to the north, South La Cienega Boulevard to the east, Corbett Street

(a private street) and a single-story See's Candies factory to the south. The Project Site is served by a network of regional transportation facilities providing connectivity to the greater Los Angeles County (see **Figure II-1, Regional and Project Vicinity Map**). Regional access to the Project Site is provided by Interstate 10 (I-10), approximately 0.6 mile to the north. South La Cienega Boulevard and West Jefferson Boulevard both serve as major thoroughfares.

The elevated Metro E Line runs directly north of the Project Site parallel to West Jefferson Boulevard, with the La Cienega / Jefferson Metro Station at the south side of the intersection between West Jefferson and South La Cienega Boulevards. The La Cienega / Jefferson Metro Station is located less than 100 feet to the north and provides direct access to the City of Santa Monica to the west and downtown Los Angeles to the east. The E Line also provides a link to Union Station. Union Station provides access to most of the region's rail and bus lines, linking to major job centers throughout Los Angeles County. The E Line connects with both the B Line, which provides access to Hollywood, and the Gold Line which provides access to the City of Pasadena and areas east of the Project Site. The E Line runs approximately every 10 to 20 minutes depending on direction and time of day.

The Metro Bus system provides local service along South La Cienega Boulevard. Bus Route 105 travels north/south along South La Cienega Boulevard with a stop at South La Cienega Boulevard directly in front of the Project Site. Additional bus lines include Bus Route 217 traveling north/south along South La Cienega Boulevard, and Bus Route 38 provides additional service east/west along Jefferson Boulevard. The Project Site's northern property line also abuts an existing bicycle path along Jefferson Boulevard that connects directly to the Ballona Creek Bike Path, which constitutes part of the Los Angeles County Park to Playa Trail that links numerous public recreational opportunities including Kenneth Hahn State Recreational Area, Baldwin Hills Scenic Overlook, Culver Park, and the Pacific Ocean.

As shown in **Figure II-2, Aerial View of the Project Site**, the Project Site is in a highly urbanized location surrounded by a mix of land uses, including commercial, residential, industrial, and office. Immediately north of the Project Site is a Metro right-of-way for the E Line tracks and bicycle path. The Metro property runs along Jefferson Boulevard for the length of the Project Site and the La Cienega / Jefferson Metro Station is located abutting the Project Site's northeast corner. Across Jefferson Boulevard to the north, is the "Cumulus Project" that, once completed, will have a 320-foot-tall high-rise building and a 110-foot-tall podium building with multifamily residential, commercial, and retail uses (with 1,200+ units). To the east of the Project Site across South La Cienega Boulevard is a five-level parking structure serving as parking for Metro patrons. South of the Project Site

along South La Cienega Boulevard is a single-story Sees' Candies factory. To the west of the Property is a 16-story office building (currently under construction) known as the "(W)rapper."

C. Site Background and Existing Site Conditions

Located on the Project Site are nine single-story masonry structures in use as a privately owned Public Storage self-storage facility. Two of the buildings were constructed in 1946, and the remaining seven were constructed approximately in 1977. Photographs of the Project Site are provided in **Figure II-3, Photographs of the Project Site**. As further described in this document, none of the existing buildings on the Project Site constitute a historical resource under CEQA.

Existing landscaping on the Project Site is limited and consists of two non-native and non-protected trees. No street trees are located on the Project Site. The two onsite existing trees are both Pine species with a trunk diameter of less than 8 inches. The Proposed Project would remove the existing trees and replace the trees in accordance with City requirements. The City of Los Angeles requires 1 tree per every 4 units for a total of 65 required trees. The Proposed Project will add 82 trees (an excess of 17 above the requirement) including three street trees for a net increase of 80 trees. Anticipated trees to be planted include Olea europaea (Swan Hill Fruitless Olive), Prosopis (Phoenix Mesquite), Acacia willardiana (Palo Blanco), and Rhopalostylus sapida (Nikau Palm). Any street trees will be planted in accordance with Los Angeles Department of Urban Forestry. The street trees will be subject to replacement requirements to the satisfaction of the Department of Public Works, Urban Forestry Division.

D. Planning and Zoning

The Project Site is within the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan Area and is designated as Hybrid Industrial which corresponds to the Property's zoning of Commercial Manufacturing within a Community Plan Implementation Overlay [CM-2D-CPIO]. CM permits manufacturing and industrial establishments, while the CPIO allows zoning to implement policy goals and objectives associated with a Community Plan and further regulate different aspects of proposed projects. The CPIO applies to the West Adams–Baldwin Hills–Leimert Community Plan Area as part of the Jefferson/La Cienega-Expo Line Transit Oriented Development (TOD) subarea. This subarea identifies specific blocks surrounding the Metro Expo Line of the La Cienega/Jefferson Station, and provides specific use limitations, development standards, and streetscape guidelines for projects to facilitate TOD. The subarea also identifies

parcels where a range of development heights and intensities are permitted.[1] The Project Site is located within the Council District 10 and the West Adams Neighborhood Council.[2]

The Proposed Project is located within the Los Angeles State Enterprise Zone (ZI-2374). In 2008, the City of Los Angeles adopted an ordinance amending Sections 12.22, 12.24, 14, and 19.01 of the LAMC to implement a Density Bonus Ordinance as mandated by State law. This ordinance creates affordable housing incentives by allowing developers to build more housing units than is otherwise allowed so long as a project includes affordable or senior housing units.[3] This ordinance helps meet the State's goal in providing more affordable housing through California's Density Bonus Law and is consistent with the City's General Plan policies (see **Section IV-11, Land Use and Planning**).

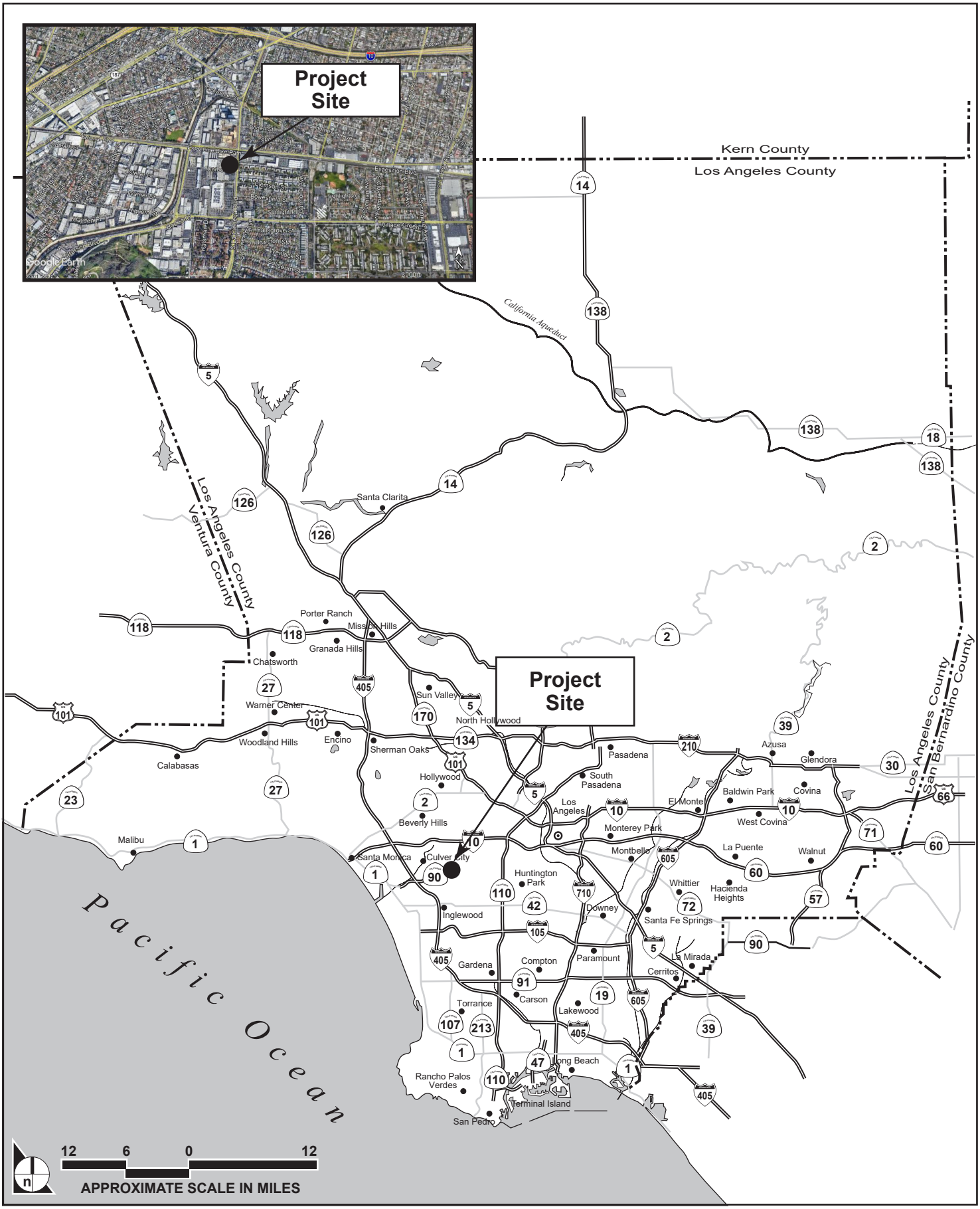
In accordance with the LAMC, the minimum lot area per dwelling unit in the CM zone is 800 sf. Therefore, the maximum permitted residential density is 192 units (153,608 sf/800 sf). The Applicant intends to set aside 11% (22 units) of the base maximum density (192) as "very low income" restricted affordable units. Accordingly, the Proposed Project qualifies for a density bonus of up to 35%, which would allow for the 260 units that the Applicant proposes. The Applicant also proposed to set aside 4% (7 units) of the Proposed Project's base units for workforce housing.[4]

1 West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay, Ordinance No. 184794, effective April 19, 2017, amended August 25, 2019. https://planning.lacity.org/odocument/2734c47b-7178-4d3e-b38b-aa56a50cdb2c/wadcpio-TOCversion.pdf

2 West Adams Neighborhood Council, https://westadamsnc.org/

3 See LA City Ordinance 197681, https://planning.lacity.org/odocument/e811b5a6-294b-474e-accb-064cb8a4eb4f/DB_Ord.pdf

4 Rents for workforce housing shall be restricted to 150% of Area Median Income pursuant to Los Angeles Housing & Community Investment Departments' Land Use Schedule I.



SOURCE: Impact Sciences, 2021.

FIGURE **II-1**

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Regional and Project Vicinity Map

SOURCE: Google Earth, 2021.

FIGURE **II-2**

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Aerial View of the Project Site

Facing West

Facing Northwest

Facing East

Facing Southwest

SOURCE: Impact Sciences, Inc., 2021.

FIGURE **II-3**

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Photographs of the Project Site

E. Project Characteristics

The Proposed Project would demolish the nine existing buildings on the Project Site and construct a fully integrated mixed-use development. As described in more detail below, residential uses would include approximately 230,412 sf of floor area and 260 units in a 149'-6"-tall Residential Building up to 13 stories high on the western portion of the Project Site. The 92-foot-tall Commercial Building (office and ground floor retail) would include 230,412 sf of floor area up to six stories high on the eastern end of the Project Site. Both buildings would be adjacent to each other on the same parcel and connected by pedestrian and commercial plazas on the ground floor with a floor area ratio (FAR) of 3:1. floor area ratio (FAR) of 3:1. The proposed uses are summarized in **Table II-1, Project Summary**. The overall site plan is provided in **Figure II-4, Project Site Plan**. Floor plans for each of the levels are provided in **Figure II-5** through **Figure II-19**. Proposed Project elevations are provided in **Figure II-20** and **Figure II-21**.

Table II-1
Project Summary

Total Lot Area	**153,608 square feet (sf) (3.53 acres)**
Floor Area Ratio (FAR)	3:1
Total Permitted Density	460,824 sf
Required Residential Open Space (Per LAMC 12.21-G.2)	28,925 sf
Total Floor Area	**460,824 sf**
Residential Floor Area	230,412 sf
Office Floor Area	227,543 sf
Retail Floor Area	2,869 sf
Total Residential	**260 units**
Studio	26 units
One Bedroom	143 units
Two Bedroom	78 units
Three Bedroom	13 units
Total Publicly Accessible Open Space	**34,214 sf**
Usable Open Space (Per LAMC 12.21-G)	28,925 sf
Additional Exterior Common Open Space[5]	22,836 sf
Total Provided Trees	**82**
Level 1 Trees – Right of Way	3
Level 1 Trees – Onsite, Ground Floor	57
Level 2 Trees – Amenity Deck	22

5 Open Space that is provided in addition to the "Usable Open Space," which is the open space required under LAMC.

Residential Uses

The Residential Building will be located on the western portion of the Project Site and contain 260 residential units. 11% (22 units) of the base units (192) will be restricted at "very low income" levels and 4% (7 units) of the base units (192) will be restricted to workforce housing.[6] This building will have 26 studios, 143 one-bedroom units, 78 two-bedroom units, and 13 three-bedroom units The Residential Building will contain various residential amenities for the use of the residents and their guests, such as a ground floor lobby, package room, mail room, bicycle storage with bicycle repair equipment, wellness room, lounge, club room, and amenity decks.

The Residential Building's third level Amenity Deck will offer outdoor activities and spaces, including a lounge space, swimming pool, and communal dining area. The Residential Building will also include a rooftop Amenity Deck with a lounge area and hot tub.

Private open space (800 sf) will be provided in balconies and terraces for various residential units which would comply with the requirements of LAMC § 12.21-G. In addition to the 800 sf of terrace space that qualifies for Private Open Space under LAMC § 12.21-G, the Proposed Project will also feature an additional 14,147 sf of private balcony and terrace space for the residents of the entire building.

Commercial Uses

The Commercial Building will be located on the eastern portion of the Project Site. The 2,869-sf ground floor retail ("Retail Space"), (most likely food and beverage) will be located at the northeast corner of the Commercial Building, visible from the Metro station. The Commercial Building will also include easily accessible ground floor end-of-trip facilities to encourage bicycle and pedestrian commuting which may include lockers, showers, and bicycle storage with bicycle repair equipment.

The Commercial Building will feature a ground floor lobby extending through the center of the building providing a direct physical and visual access to both the Crossings Plaza (discussed below) at the Project Site's northeast corner and a vehicular drop-off area southwest of the Commercial Building. The Commercial Building will also feature external stairs and pathways to promote walkability and external access between the office levels.

6 The rents for the workforce housing shall be restricted at 150% of Area Median Income pursuant to Los Angeles Housing & Community Investment Department's Land Use Schedule 1.

Ground Level Concept

As shown in **Figure II-22, Composite Plan**, the Proposed Project will have nearly one acre of ground level landscaping, open space, and interactive features to activate the ground floor, encourage bicycle and transit use, and enhance the pedestrian experience. A series of walkways loop through the Project Site to connect building lobbies, landscaping, and plazas throughout the Project Site. The ground floor design aims to connect users to the outdoor plazas and squares as well as the surrounding neighborhood. Due to its ideal location abutting the La Cienega / Jefferson Metro station, and existing bicycle path along Jefferson Boulevard, the Proposed Project capitalizes on this opportunity to enhance the existing Metro station and bicycle path with the addition of a outdoor plaza directly connecting those public features to the Proposed Project and the community.

Key components of the ground level program include:

- **The Crossings Plaza:** A public space will be located on the northeast corner of the Project Site. The plaza's landscaping will screen the Proposed Project from South La Cienega Boulevard while connecting the Proposed Project's open spaces with the bicycle path, Metro station, and surrounding neighborhood.

- **Cienega Square:** A landscaped plaza will be located at the heart of the Proposed Project between the two buildings and stretch parallel to the bicycle path. This area enhances the cyclist and pedestrian experience with opportunities for bicycle and pedestrian infrastructure; landscaping; and public art that leverages the adjacency to the bike path along the north end of the site. It will feature both fixed and moveable seating elements, reinforced turf, and a lawn expanse.

- **Connected Levels:** Each buildings' respective lobbies have direct visual and physical links to the upper-level amenity decks and terraces.

- **Emphasis on Bicycle Travel:** The Proposed Project will have bicycle access and bicycle parking that is highly visible and accessible from the existing bicycle path and other public open spaces. The Proposed Project will also provide end-of-trip facilities to encourage bicycle commuting, including bicycle storage with bicycle repair equipment, lockers, and showers.

- **Neighborhood Serving Retail:** 2,869 sf of ground floor retail, most likely food and beverage, located at the northeast corner of the Commercial Building will welcome residents, Metro users, and passersby into the Crossings Plaza.

- **Primarily Subterranean Parking:** A limited number of parking spaces are at or above grade, minimizing their visibility from the Metro station and the pedestrian areas.

Open Space

Publicly Accessible Open Space

Projects on a lot size equal to or greater than 15,000 sf are encouraged to maintain at least 20% open space as publicly accessible. Twenty percent of the Project Site is 30,721.6 sf. The Project proposes 34,214 sf of publicly accessible open space on the ground floor (as well as 1,350 SF for a dog relief area for residents, and 1,250 SF office amenity cowork patio, but these areas will not be open to the general public), and therefore provides open space in excess of the requirement.

Residential Open Space

The Proposed Project would be required to comply with LAMC § 12.21-G and provide residents with Usable Open Space based on the number and type of units. Usable open space may consist of Private Open Space or Common Open Space, as defined in LAMC § 12.21-G.

To fulfill the open space requirement, the Proposed Project will provide 800 sf of Private Open Space in the form of terraces for various residential units, 14,147 sf of Common Open Space on the 3rd level Amenity Deck, and 13,978 sf of Common Open Space on the ground floor. The 3rd level Amenity Deck will include a lounge space, swimming pool, and communal dining area. This would fulfill the LAMC § 12.21-G requirement and provide 28,925 sf of Usable Open Space for residents.

In addition to the Private and Common Open Space satisfying the requirements of LAMC, the Proposed Project will include an additional 22,836 sf of open space on the ground floor that will be accessible by Proposed Project's residents. The Proposed Project will also include a rooftop amenity deck, the sf of which will be determined later. In addition to the 800 sf of terrace space, the Proposed Project will also include approximately 14,147 sf of other balcony and terrace space for the residents.

Access and Circulation

Vehicular access will be provided via South La Cienega Boulevard on the south side of the Proposed Project's buildings to accommodate above grade parking, access to the subterranean parking structure, pick up and drop areas, and loading spaces. A second point of egress is located along Corbett Street, which is a private street south of the

Project Site that feeds into South La Cienega Boulevard.

Automobile Parking

The Proposed Project proposes to provide up to 785 automobile parking spaces on-site, the majority if which will be within two levels of subterranean parking. The few above grade parking stalls will be screened from the pedestrian and bicycle activated open space areas north of the buildings. Although LAMC would require 907 parking spaces for the Proposed Project, the Proposed Project is within the West Adams CPIO which limits parking to 50% of the LAMC minimum requirement. The Proposed Project's entitlements include a development incentive under the Density Bonus Law that allows the Proposed Project's parking to exceed the West Adams CPIO. The 785 parking stalls proposed for the Proposed Project is under the number of stalls the LAMC would require for the Proposed Project in the absence of the West Adams CPIO's 50% cap. The following outlines the applicable parking standards and policies for the Proposed Project's residential and commercial uses.

- **Residential Parking:** Under the Density Bonus Law, required parking includes 0.5 parking stalls for each residential unit.[7] As such, 130 spaces of the 785 spaces would be allocated exclusively for residential use.

- **Commercial Parking:** LAMC requires a parking ratio of two spaces per 1,000 gross square feet of retail, restaurant, and other commercial uses. As such, 242 spaces of the 785 spaces would be allocated exclusively for commercial uses.

- **Unbundled Parking:** The remaining 413 spaces of the 785 spaces would be unassigned and could be used for either commercial or residential uses. The intent would be to utilize these spaces to respond to user demand which may fluctuate throughout the day or over the Proposed Project's life, allowing for an efficient timeshare of the spaces. Such uses may include additional parking for the office and retail tenants, for the residential, or for offsite third party uses such as other businesses in the vicinity.

Bicycle Parking

Pursuant to LAMC Section 12.21-A.16, the Proposed Project would be required to provide a minimum of 222 bicycle parking spaces. The Proposed Project would be required to supply 23 short-term and 46 long-term bicycle parking spaces for commercial uses, for a total of 69 bicycle parking spaces. The proposed residential units would require 13 short-

7 California Government Code § 65915(p)(2)(A), as modified by Assembly Bill 2345 (Gonzalez)

term bicycle parking spaces and 140 long-term bicycle parking. The Proposed Project would meet these requirements and would provide 222 bicycle parking spaces (153 spaces for residential uses and 69 spaces for commercial uses)

The parking requirements for automobiles and bicycles are summarized in **Table II-2, Parking Summary**.

Table II-2
Parking Summary

Residential Parking Summary					
Building Units	**No. of Units**	**Parking Spaces per Unit (Density Bonus Law)**	**Minimum Required (LAMC)**	**Required (Density Bonus Law)**	**Proposed Project Spaces**
Studios	26	0.5	26	13	13
1 Bedroom	143	0.5	214.5	71.5	71.5
2 Bedroom	78	0.5	156	39	39
3 Bedroom	13	0.5	26	6.5	6.5
Total Residential Parking Spaces	260	0.5	423 (422.5)	130	130
Commercial Parking Summary					
Commercial Building	**Square Feet (SF)**	**Spaces per 1,000 SF**	**Minimum Required (LAMC)**	**Required (CPIO)**	**Proposed Project Spaces**
Office Use	227,543	2	455 min.	228 max (227.5)	228
Retail Use	2,869	10	29 min.	14 max	14
Total	230,412		484 min.	242 max.	242
Additional Unbundled Parking			**Required (LAMC)**	**Required (CPIO)**	
Unbundled			-	-	413
Total Overall Parking Spaces					785
Bicycle Parking Summary					
Land Use	**Size**			**Bicycle Spaces**	
Residential	260 units			13 Short Term 140 Long Term	
Office/Retail	230,412 SF			23 Short Term 46 Long Term	
Total				**36 Short Term** **186 Long Term**	

Lighting and Signage

New lighting would include building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project Site would be well-lit for security and ground-mounted. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive residential land uses.

Building identification signage for the ground level commercial use would be visible from La Cienega Boulevard. The building would also include street address and identification/wayfinding signage for the vehicular and pedestrian entries to the building. Lighting would be designed in conformance with LAMC requirements and would not exceed the footcandle light intensity level required at the property line of the nearest sensitive receptor.

Security

Design Out Crime/Crime Prevention through Environmental Design. Through the City's land use and building permit process, the LAPD's Crime Prevention Unit provides guidance on design techniques for new developments to incorporate crime prevention into the development design. The techniques and process are outlined in the Design Out Crime Guidelines: Crime Prevention Through Environmental Design, and include the following basic concepts:

- **Natural surveillance:** The placement of physical features, activities, and people in a way that maximizes visibility.
- **Natural access control:** Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- **Territorial reinforcement:** The use of physical attributes to define ownership and separate public and private space.

The Proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments.

Closed circuit television (CCTV) cameras would be mounted on the building exteriors, in the various residential lobbies at plaza level and throughout all levels of the parking garage that would record activity on the property at all times. The cameras would also be connected to a computer screen in the main lobby at the daytime concierge desk.

Green Building and Sustainability

Energy saving and sustainable design would be incorporated throughout the Proposed Project. The Proposed Project would be designed to meet Cal Green and Title 24 Building Standards Code (CALGreen Code). The Proposed Project's infill location would promote the concentration of development in an urban location with extensive infrastructure. The Proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled (VMT) for residents and employees.

In order to promote sustainability, this Proposed Project would be aligned with Americas Residential Partnership's Responsible Property Investment Strategy & Roadmap to Net Zero Carbon. To achieve that goal, the multifamily building would incorporate:

- Net Zero Carbon from 2020 for Scope 1 & 2 in construction, and Scope 1, 2 & 3 in operation[8]
- Leadership in Energy and Environmental Design (LEED) Gold minimum
- Operational performance rating, such as FitWel

The Commercial Building is targeting:

- Net Zero Carbon from 2025 for Scope 1 & 2
- Absolute Zero by 2040 for Scopes 1, 2 & 3
- Leadership in Energy and Environmental Design (LEED) Gold minimum
- Operational performance rating, such as FitWel

Strategies that support these targets and that are proposed for the Proposed Project include:

- Designing for energy and water efficiency as a priority
- Both buildings will be entirely electric buildings (no natural gas in either building)
- ENERGY STAR Appliances

8 Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.

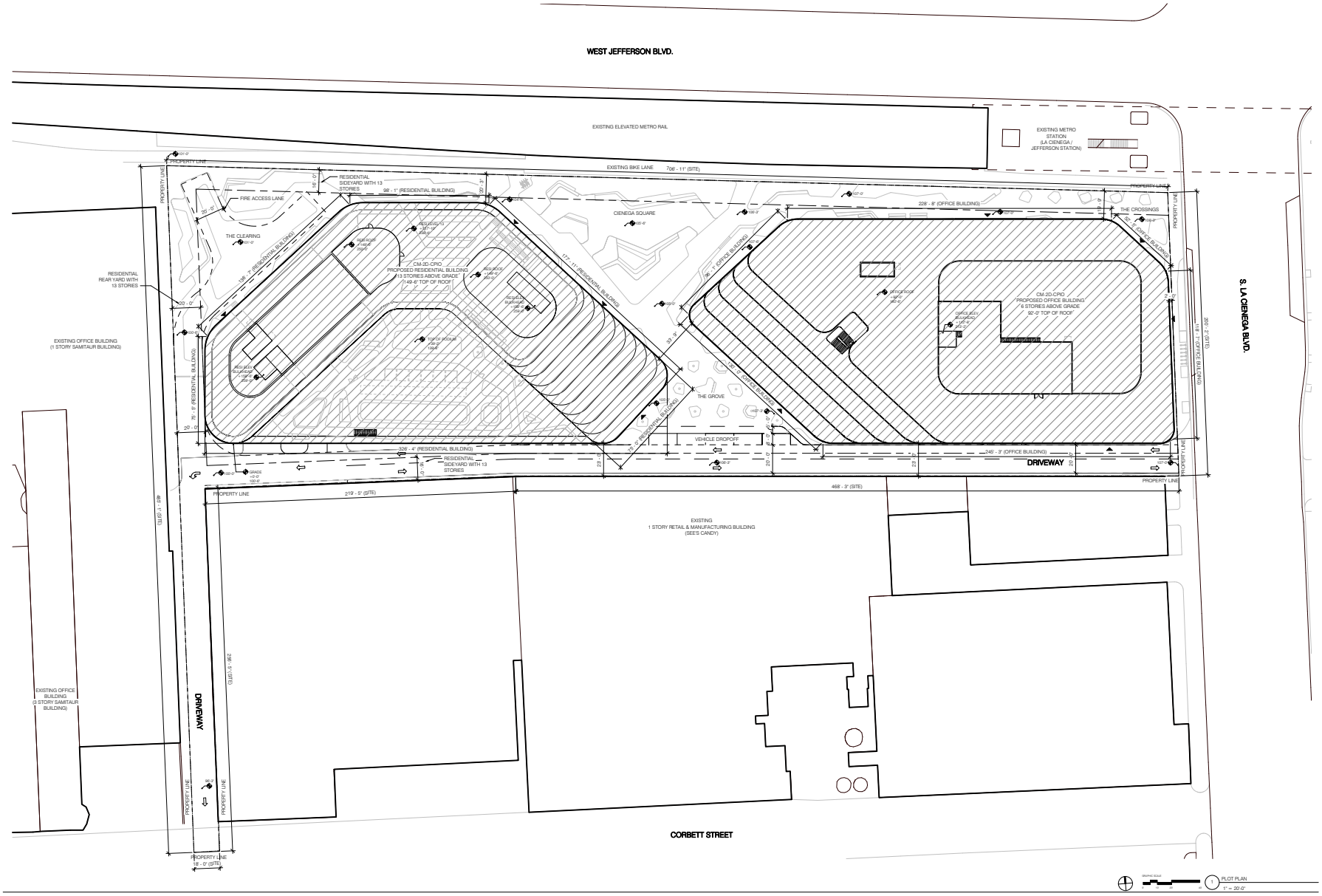
- LED lighting
- Intend to purchase 100% green power from the LADWP grid
- Variable Air Volume — HVAC (heating, ventilation, and air conditioning) system in the commercial building with MERV 15 filter + recycles outdoor air
- 100 Electric Vehicle parking spaces
- Exploring on-site Photovoltaic (PV) & battery storage
- Bike showers, lockers, and storage
- Rain water collection cistern (approximately 80,000 – 90,000 gallons) for stormwater management and reuse of water in landscaping on site
- Use of permeable paving where feasible
- Use of drought tolerant plants for landscaping
- Undertaking a Life Cycle Assessment of embodied carbon in materials to engage supply chain in achieving lower carbon material substitutions
- Construction waste diversion
- Use of low carbon concrete and rebar construction materials where feasible

The buildings will be sustainably designed to meet and/or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the Proposed Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-volatile organic compound (VOC) paints/adhesives, drought tolerant planting, and high-performance building envelopment.

Project Construction

The Proposed Project is anticipated to be constructed over a period of approximately 31 months, with completion anticipated in mid-2025. Demolition would begin in January of 2023 for a duration of 2 months. Grading would begin in March of 2023 and last for a period of 6.5 months. Paving would begin in September of 2023 and last 5 months. Building construction would then begin in February of 2024 and last for a period of 12 months. Painting would then begin in February of 2025, finishing in 6 months.

Grading activities would include cut and fill with approximately 161,000 cubic yards being exported from the Project Site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. Construction worker parking and building material laydown during construction of the Proposed Project would take place on the Project Site. The proposed haul routes would require review and approval by the City of Los Angeles.



SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-4**

Project Site Plan

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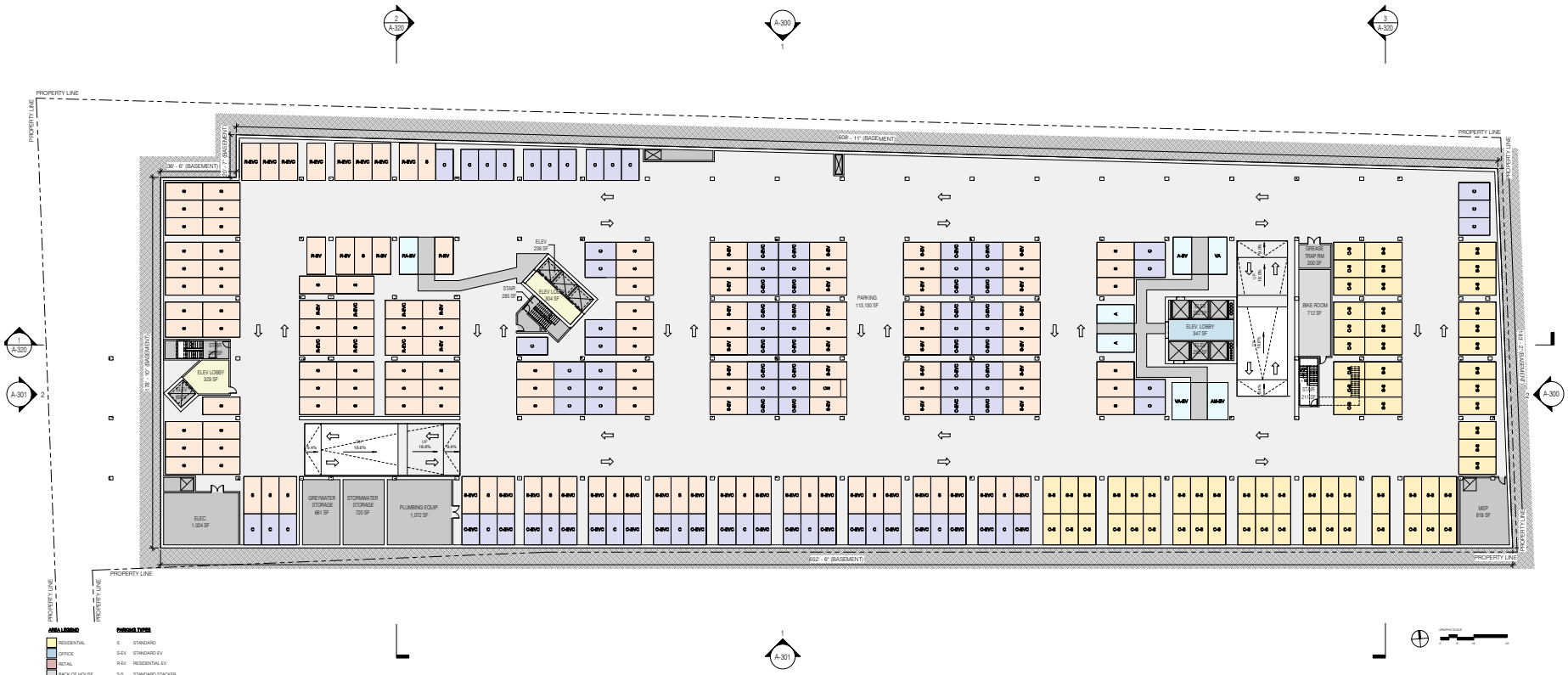


SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-5**

Floor Plan Level B1

IMPACT SCIENCES

1346.001•08/2021

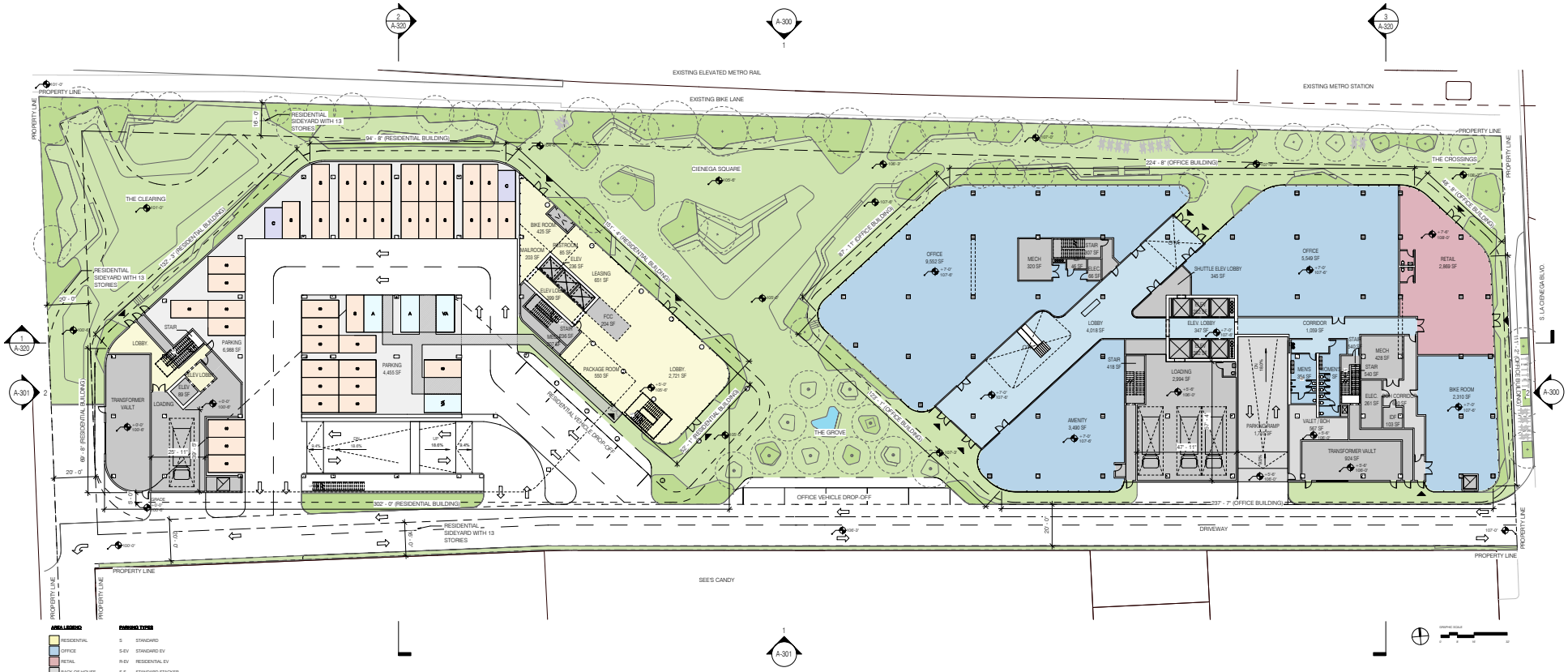
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-6**

Floor Plan Level B2

IMPACT SCIENCES

1346.001•08/2021



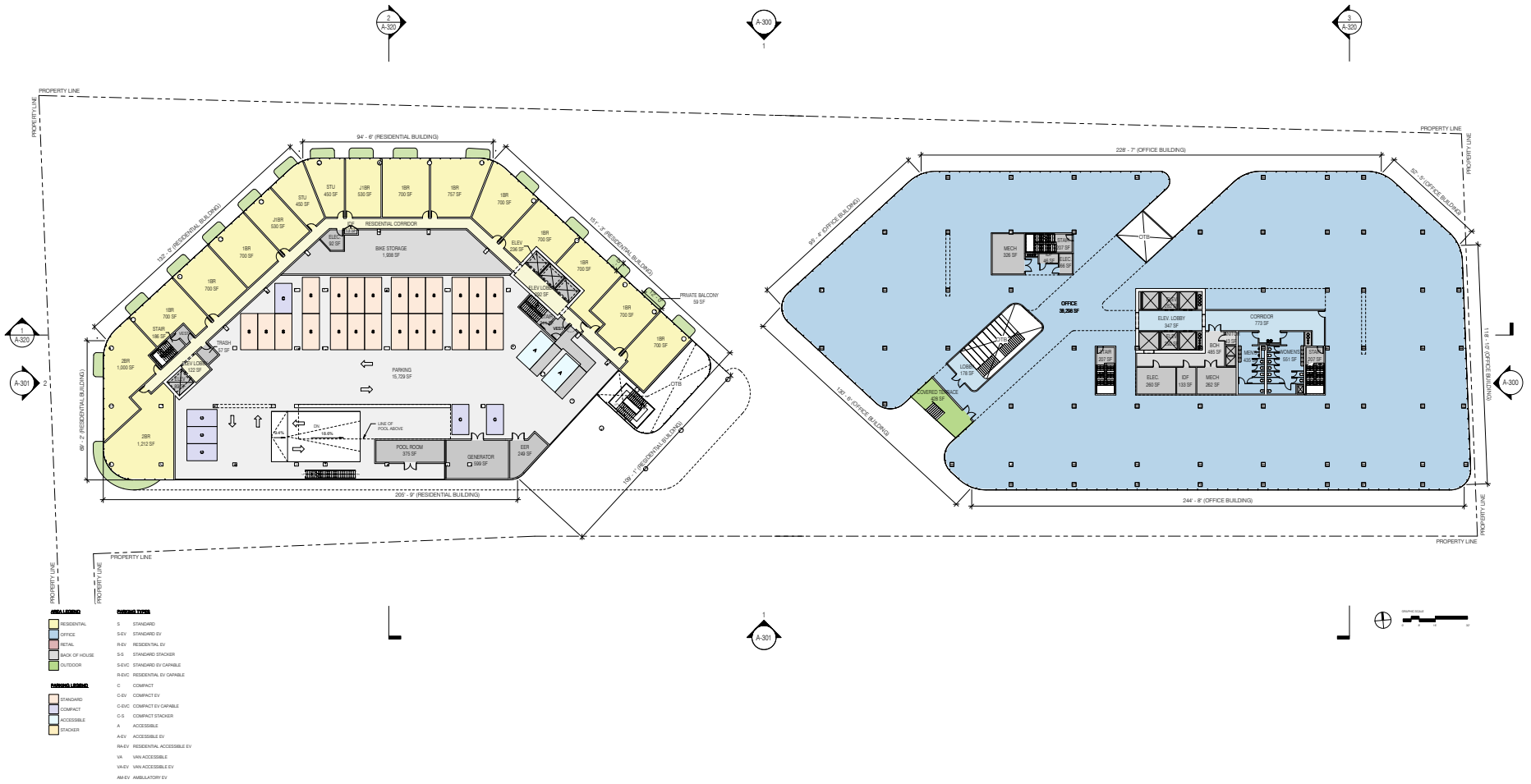
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-7**

IMPACT SCIENCES

Floor Plan Level 01

1346.001•08/2021



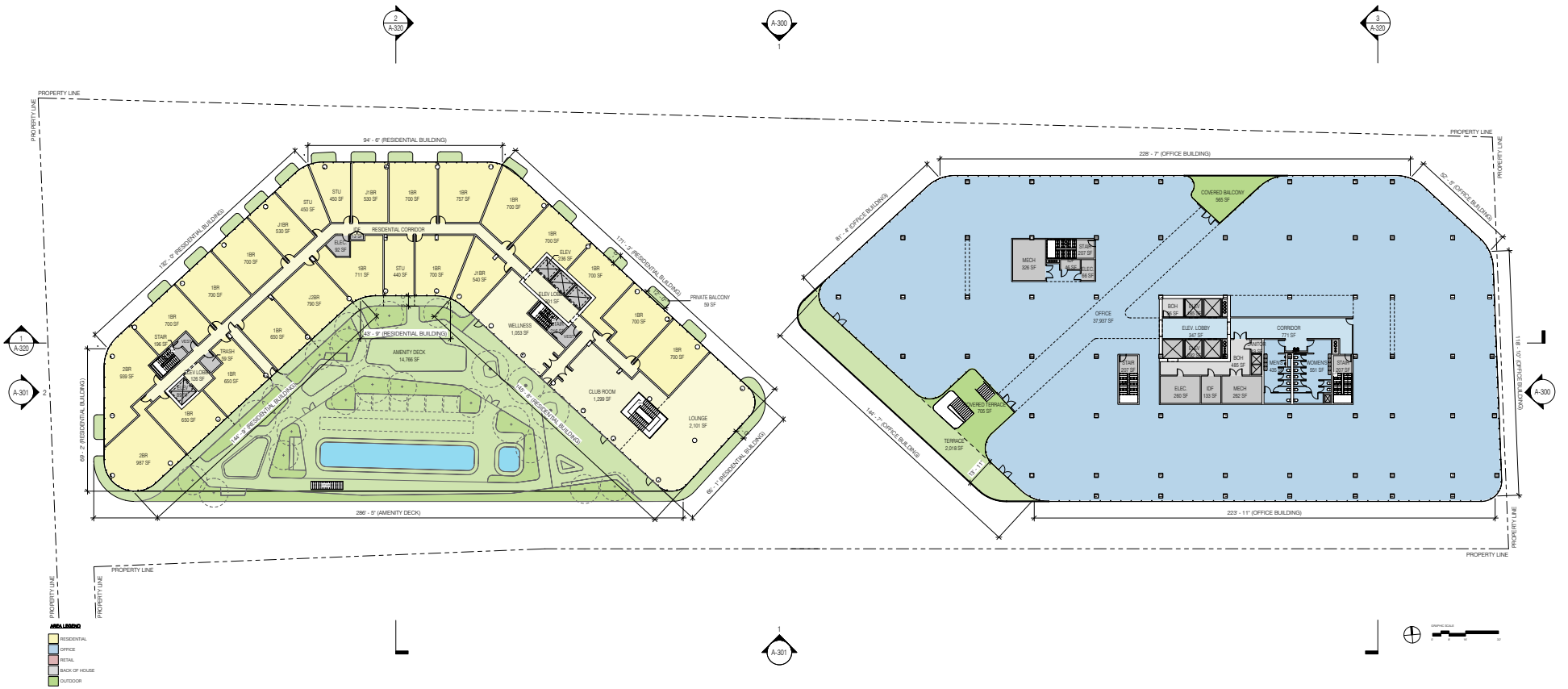
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-8**

Floor Plan Level 02

IMPACT SCIENCES

1346.001•08/2021



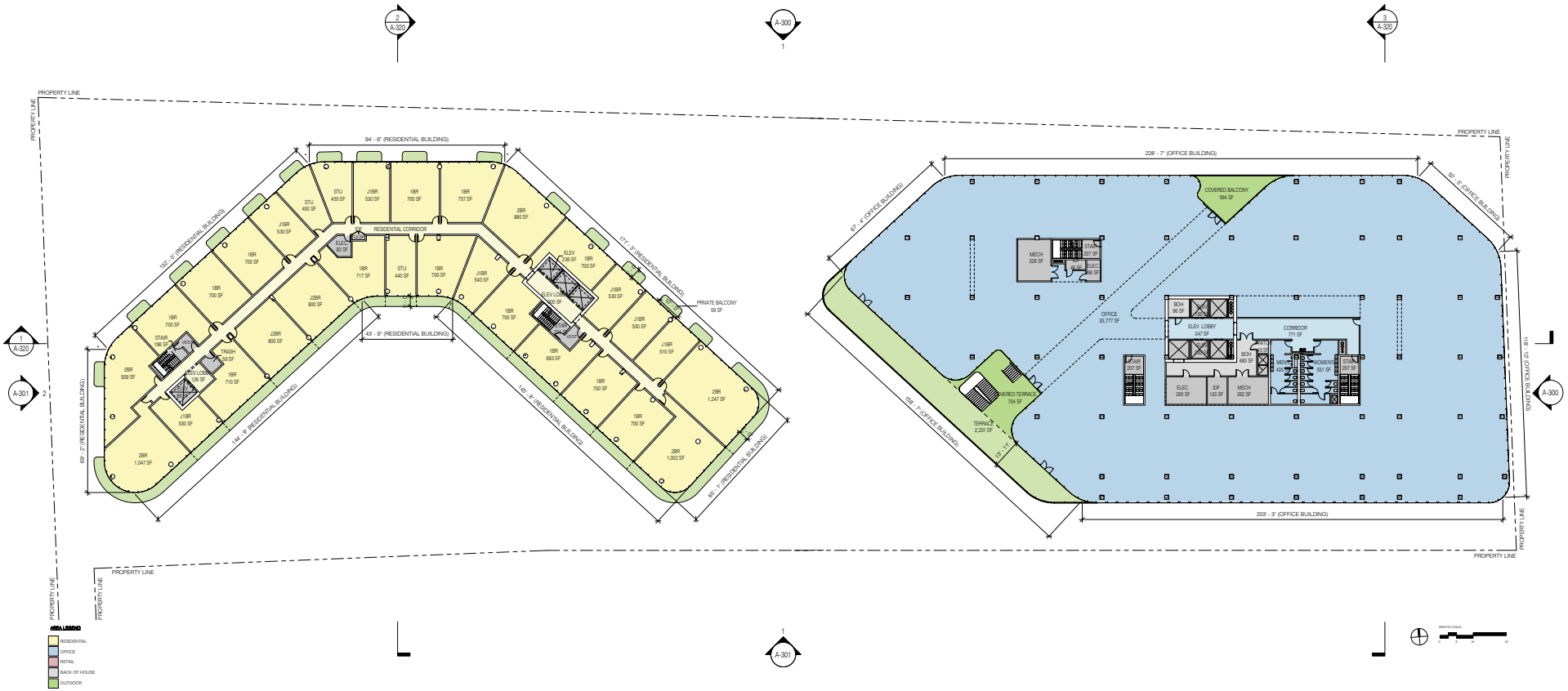
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-9**

Floor Plan Level 03

IMPACT SCIENCES

1346.001•08/2021



SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-10**

Floor Plan Level 04

IMPACT SCIENCES

1346.001•08/2021

SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-11**

Floor Plan Level 05

IMPACT SCIENCES

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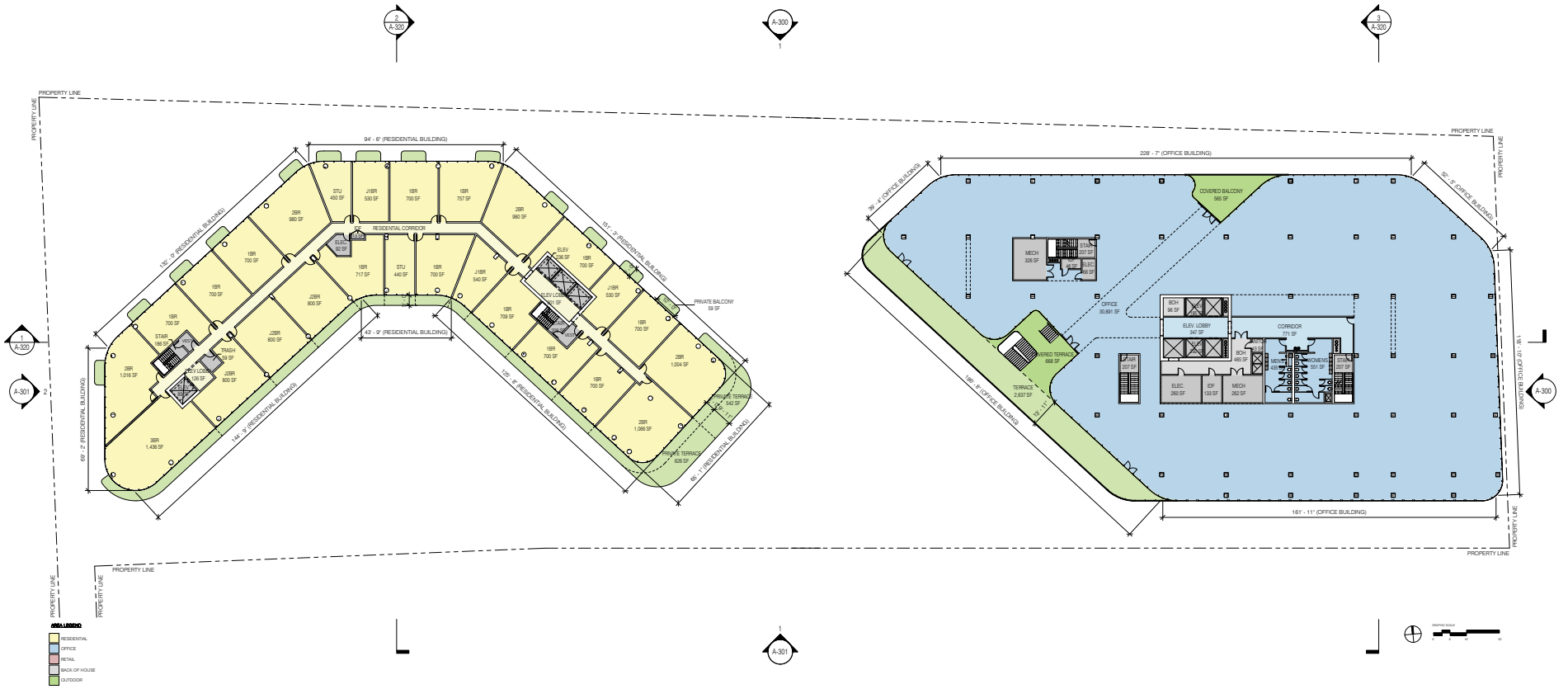


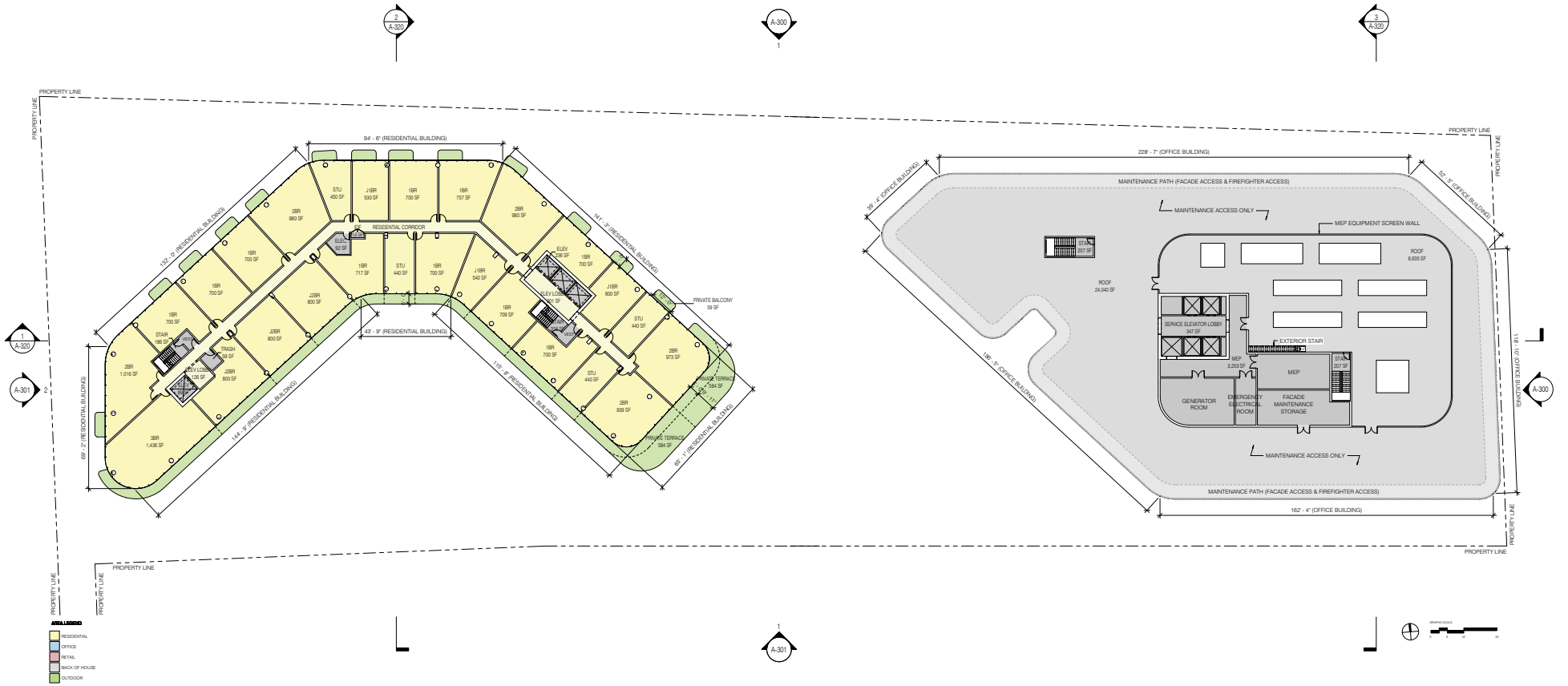
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-12**

Floor Plan Level 06

IMPACT SCIENCES

1346.001•08/2021



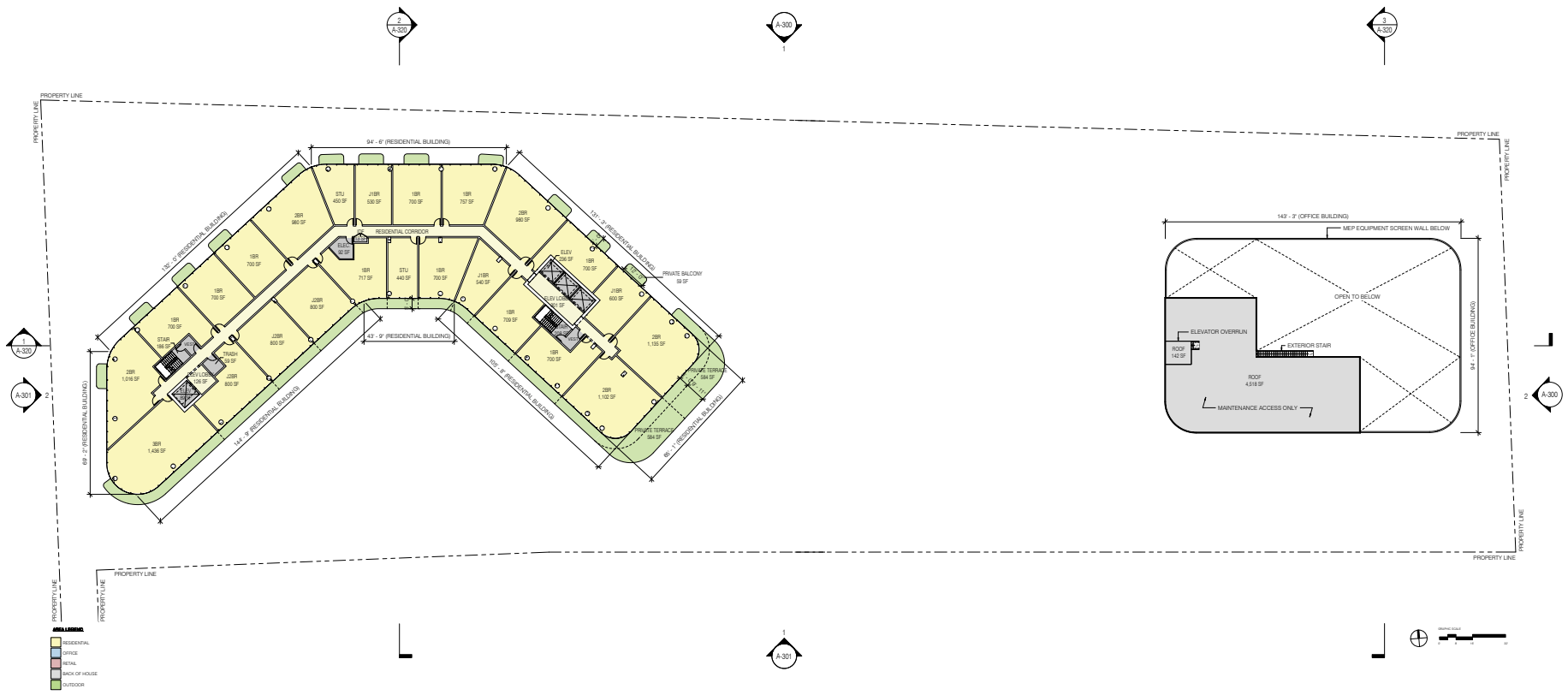
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-13**

Floor Plan Level 07

IMPACT SCIENCES

1346.001•08/2021



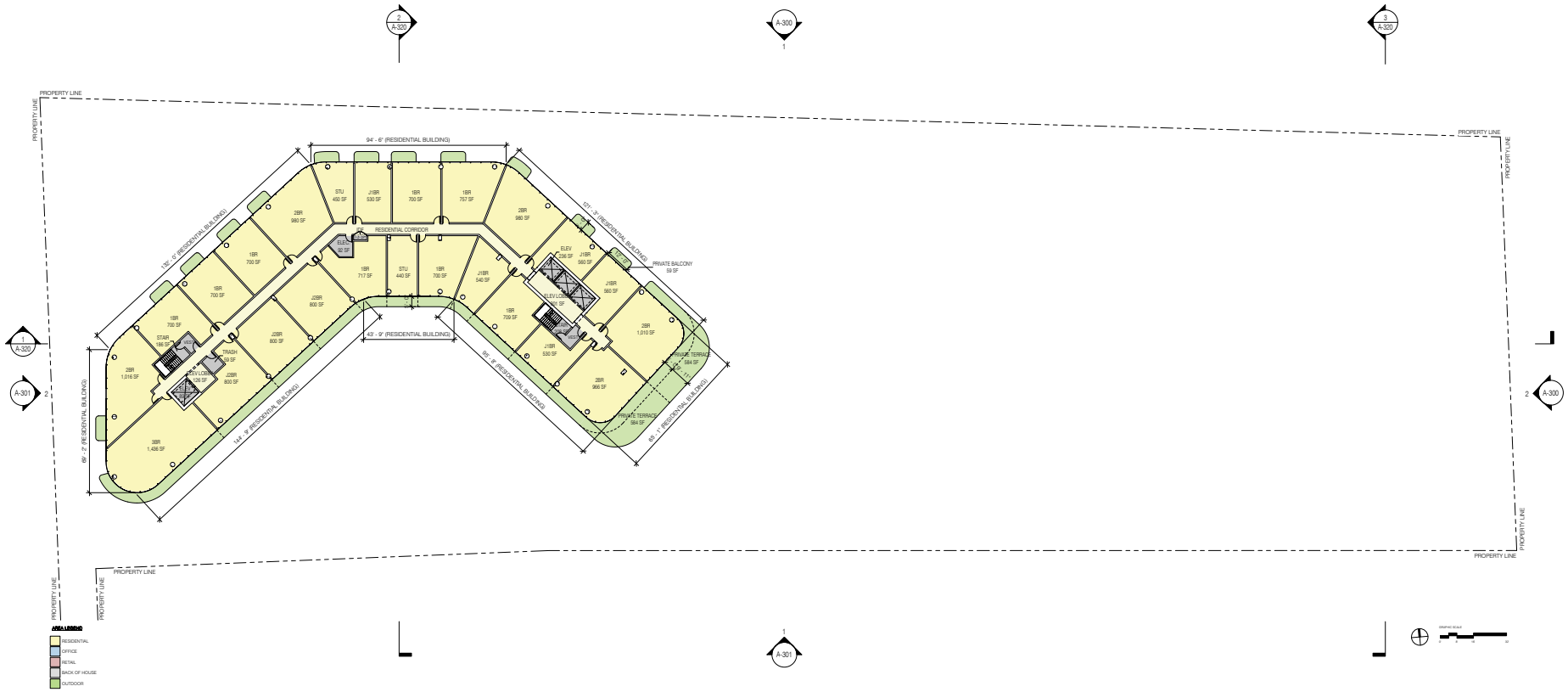
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-14**

IMPACT SCIENCES

Floor Plan Level 08

1346.001•08/2021



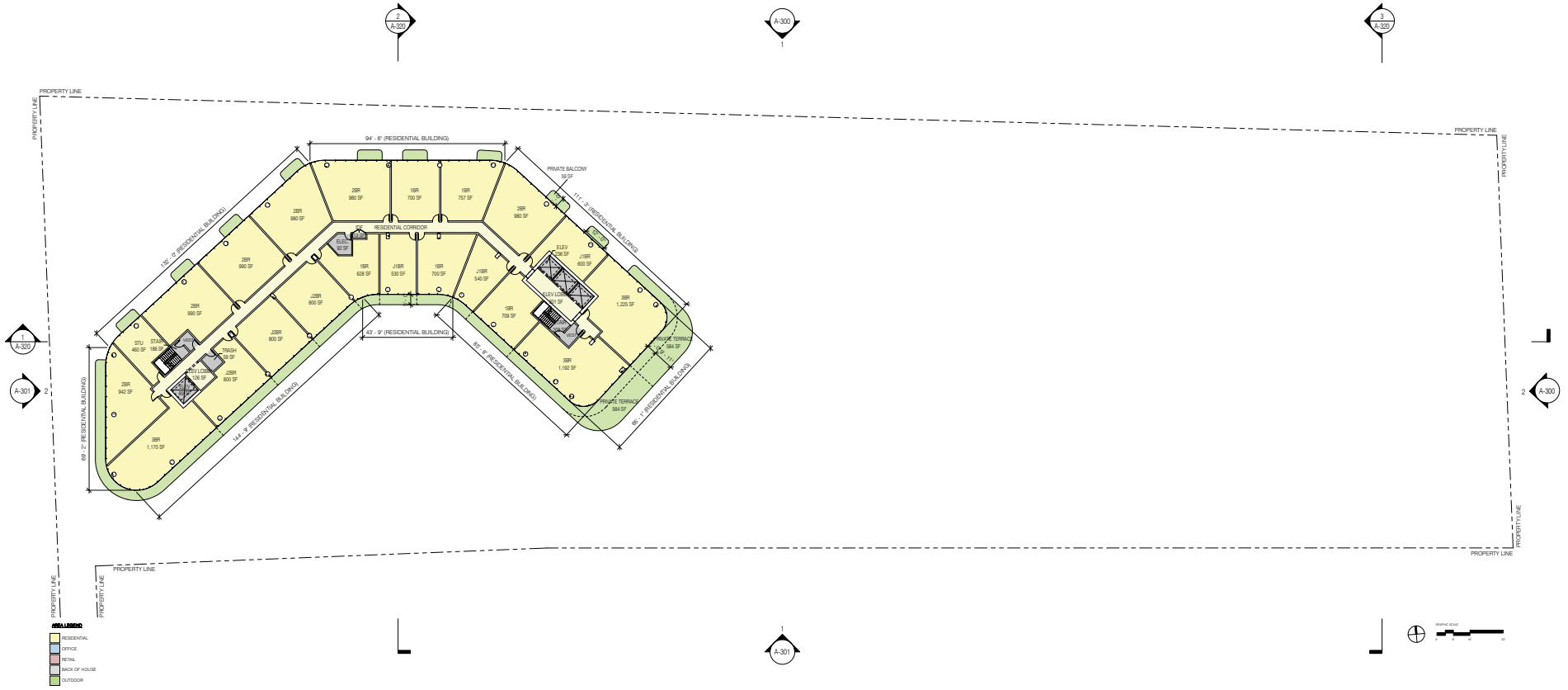
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-15**

IMPACT SCIENCES

Floor Plan Level 09

1346.001•08/2021



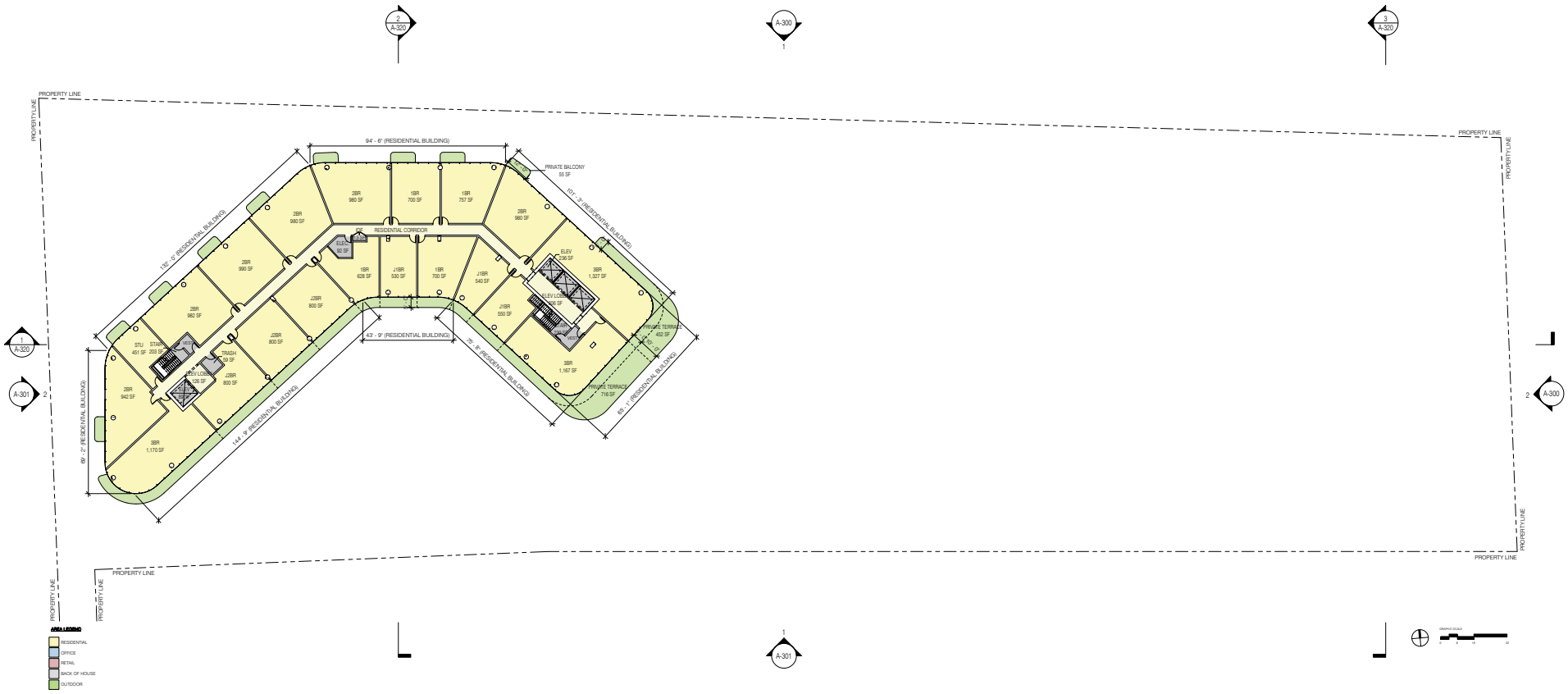
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-16**

IMPACT SCIENCES

Floor Plan Level 10

1346.001•08/2021



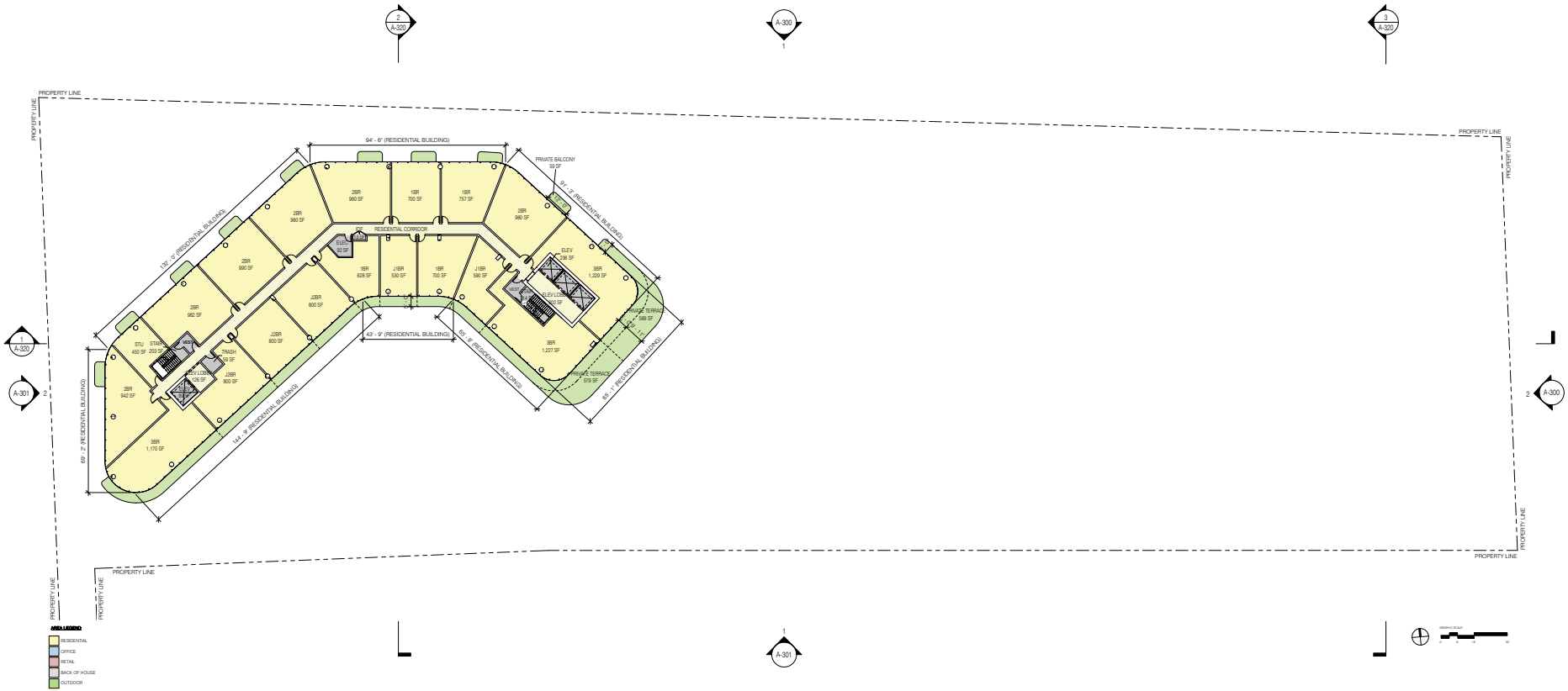
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-17**

IMPACT SCIENCES

Floor Plan Level 11

1346.001•08/2021



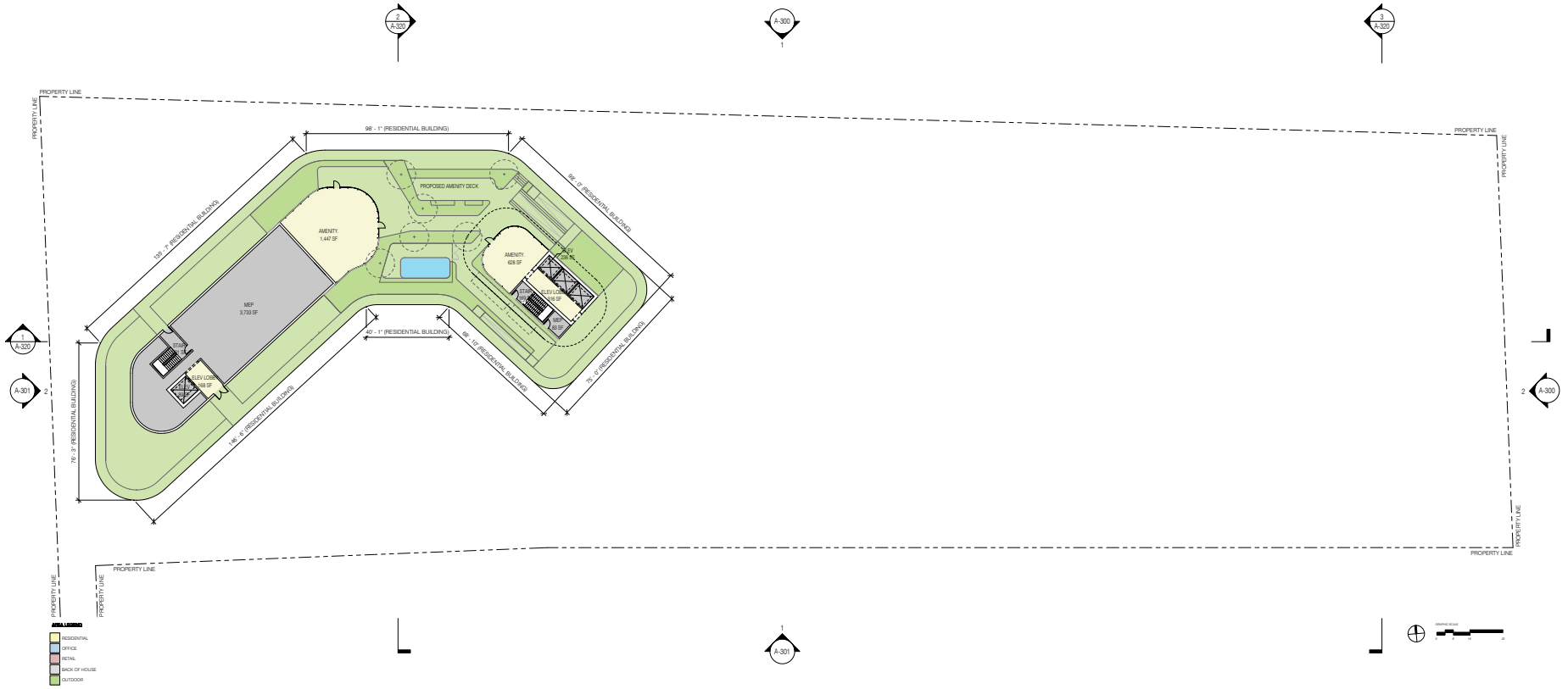
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-18**

IMPACT SCIENCES

Floor Plan Level 12

1346.001•08/2021



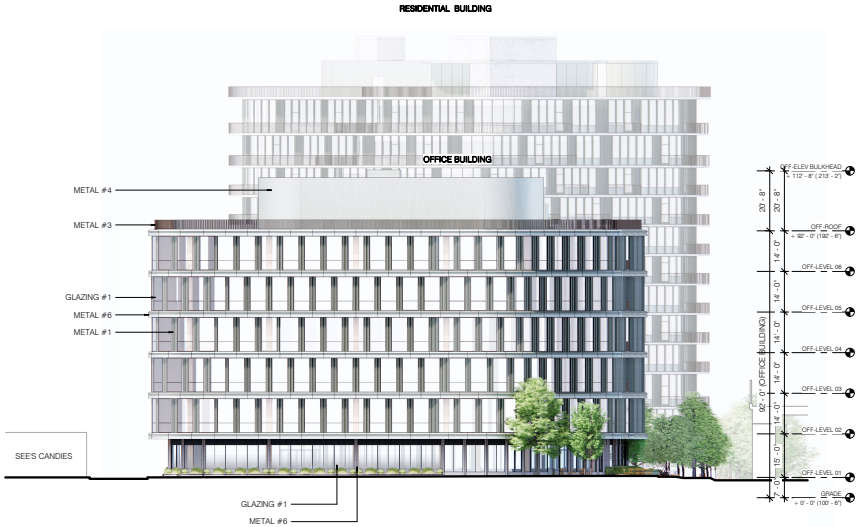
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-19**

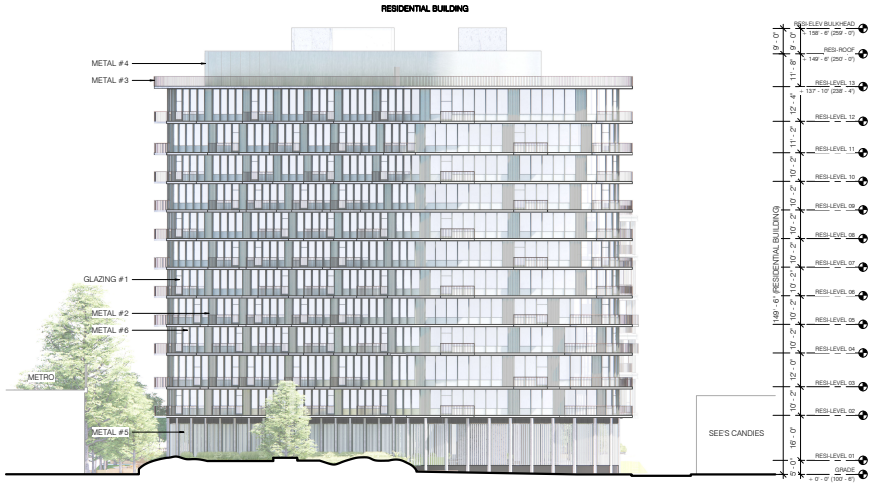
IMPACT SCIENCES

Floor Plan Level 13

1346.001•08/2021



East Elevation



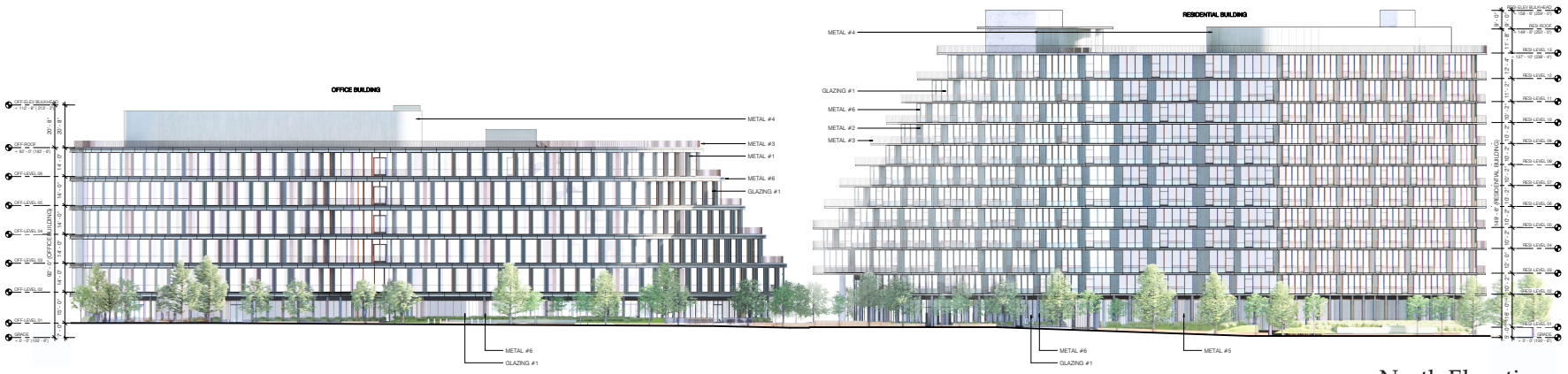
West Elevation

SOURCE: SHoP ARCHITECTS, 2021.

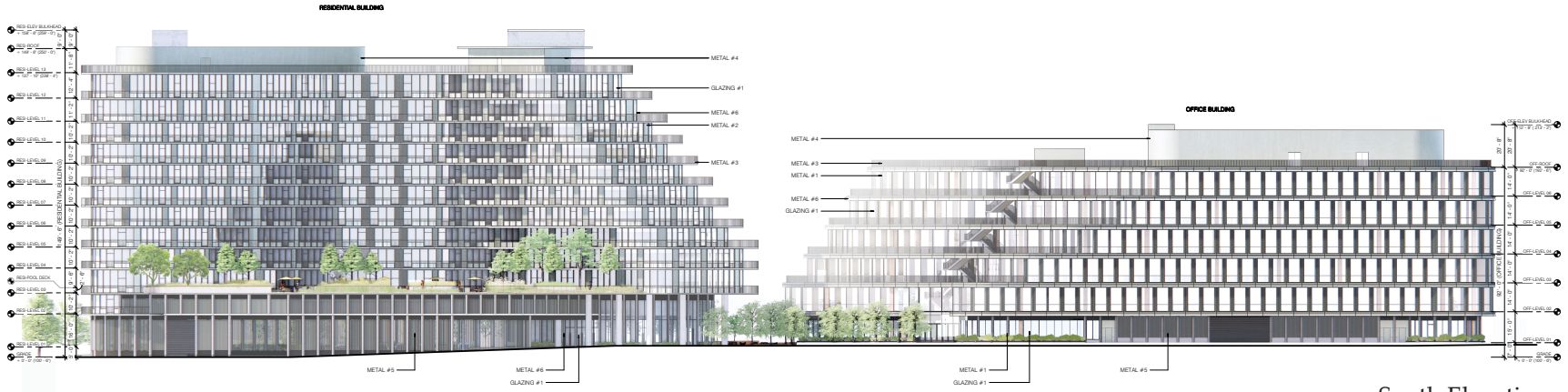
FIGURE **II-20**

IMPACT SCIENCES

East and West Elevations



North Elevation



South Elevation

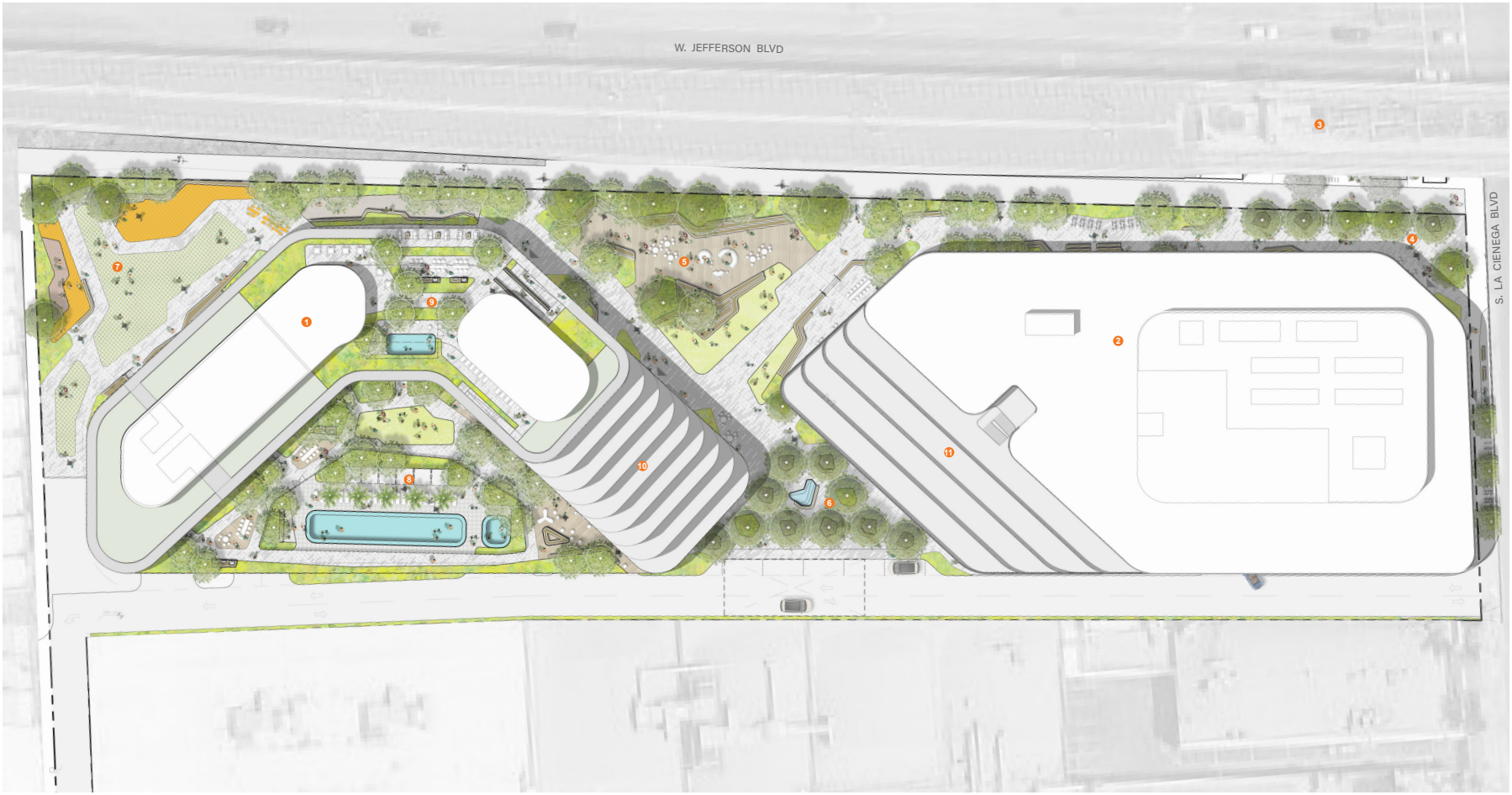
SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-21**

IMPACT SCIENCES

North and South Elevations

1346.001•08/2021



LEGEND

1. RESIDENTIAL BUILDING
2. OFFICE BUILDING
3. METRO STATION
4. THE CROSSINGS
5. CIENEGA SQUARE
6. THE GROVE
7. THE CLEARING
8. LEVEL 3 AMENITY DECK
9. LEVEL 13 AMENITY DECK
10. PRIVATE RESIDENTIAL TERRACES
11. OFFICE TERRACES

1 COMPOSITE PLAN
1/16" = 1'-0"

SOURCE: SHoP ARCHITECTS, 2021.

FIGURE **II-22**

IMPACT SCIENCES

Composite Plan

Discretionary Actions

Discretionary entitlements, reviews, and approvals required for implementation of the Proposed Project would include, but would not necessarily be limited to, the following:

- A **Density Bonus** pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a mixed use (residential and commercial) development project with 260 housing units dedicating 11% (22 units) of the Proposed Project's base units (192) to "very low income" households in exchange for the following incentives:
    - A 35% increase in the permitted residential density,
    - A residential parking ratio of 0.5 parking stalls for each residential unit pursuant California Government Code § 65915(p)(2)(A), as modified by Assembly Bill 2345,
    - One Off Menu Incentive to allow up to 92' feet in height for the commercial building and 149'6" feet for the residential building (excluding architectural features and mechanical solar and other structures), and
    - A second Off-Menu Incentive to exceed the West Adams – Baldwin Hills - Leimert Community Plan Implementation Overlay's (CPIO) cap on parking (limiting parking to 50% of the LAMC minimum parking requirements) to allow up to 785 parking stalls total, 413 of which are to be unassigned.
- A **Vesting Tentative Tract Map** (VTTM) pursuant to LAMC Sections 17.06 and 17.15 to divide the parcel into five lots (four airspace lots and one master ground lot) with one of the airspace lots to have up to 260 residential condominium units, along with a waiver of the required 2-foot dedication for sidewalk widening purposes along South La Cienega Boulevard, and an approval of a Haul Route in conjunction with the VTTM approval.
- A **Site Plan Review** pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units and more than 50,000 sf of nonresidential floor area.
- A **Conditional Use** to allow one establishment at the Proposed Project to sell and dispense a full line of alcoholic beverages (beer, wine, and liquor) for on-site consumption and the incidental sale of beer and wine for off-site consumption pursuant to LAMC § 12.24-W.1(a).

- A **CPIO Administrative Clearance** under the West Adams – Baldwin Hills – Leimert CPIO Section 6.C.2 for a project in compliance with all applicable provisions of the CPIO, as modified by the DBL and LAMC § 12.22-A.25.

- Adoption of the **SCEA**; and

- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Proposed Project. Such approvals may include, but are not limited to: construction permits, building permits, landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

III. Sustainable Communities Environmental Assessment Eligibility

A. Sustainable Communities Strategy Consistency Analysis

Senate Bill 375 (SB 375) provides CEQA streamlining opportunities for TPPs that are consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a SCS or an alternative planning strategy (APS), for which CARB has accepted a metropolitan planning organization's determination that the SCS or the APS would, if implemented, achieve the greenhouse gas emission (GHG) reduction targets established by CARB (see PRC, § 21155 [a]).

General Use Designation, Density, and Building Intensity

A qualifying TPP is a project that is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG Connect SoCal 2020-2045 RTP/SCS. On May 7, 2020, the SCAG Regional Council approved the Connect SoCal 2020-2045 RTP/SCS for conformity purposes only. On September 3, 2020, the Regional Council formally adopted the Connect SoCal 2020-2045 RTP/SCS in its entirety to provide a roadmap to expand transportation options, improve air quality, and bolster Southern California's long-term economic viability. On October 30, 2020, CARB accepted, via CARB Executive Order G-20-239, SCAG's determination that Connect SoCal would, if implemented, achieve the applicable GHG emissions reduction targets established by CARB for the region.

The Project Site, which is within one-half mile from a major transit stop since it is adjacent to the La Cienega / Jefferson Metro Station, is in an area that is considered by SCAG as a Priority Growth Area (PGA).[1] PGAs include Jobs Centers, Transit Priority Areas (TPA), High Quality Transit Areas (HQTA), Neighborhood Mobility Areas, and Livable Corridors, among other areas. SCAG identifies these areas as most suited for implementation of SCAG's growth strategies. If implemented, PGAs are expected to accommodate 64

[1] Southern California Association of Governments. 2021. Priority Growth Areas (PGA) – SCAG Region. Available at: https://hub.arcgis.com/datasets/0da9bc5fba2d4b409c8f166166bf8888_6/explore?location=33.931017%2C-117.128018%2C8.14, accessed August 17, 2021.

percent of forecasted household growth and 74% of forecasted employment growth between 2016 and 2045.

The Proposed Project would also be consistent with the land use patterns promoted by the 2020-2045 RTP/SCS Forecasted Regional Development Pattern, as shown in **Table III-1**, below. SCAG's SCS is built on a "bottom up" land use approach with engagement from local jurisdictions, meaning the overall uses are developed in coordination with local jurisdictions. Projects that are generally consistent with the general plan land use (or community or specific plan) would therefore be consistent with SCAG's use designations, including density and intensity, as the local plan informs the SCS. As discussed in **Section II, Project Description**, the Proposed Project complies with the zoning, land use designations, and development standards of the General Plan, West Adams – Baldwin Hills – Leimert Community Plan Implementation Overlay, and City's Municipal Code, including density and building intensity, except for those standards modified by the DBL. (*Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329, 1347 [finding that DBL rendered base development standards, which were modified by the DBL, inapplicable to project and thus project's inconsistency with such standards did not constitute inconsistency with applicable development standards for CEQA purposes].)

Further, the Proposed Project is not in an identified "constrained" area[2] such as on agricultural land, open space, or tribal lands and is consistent with SCS policies (see policy consistency analysis in **Table III-1**). It is therefore consistent with the general use designations, density, building intensity, and applicable policies specific to the Project Site in the 2020-2045 RTP/SCS, as outlined below in **Table III-1, Consistency Analysis with 2020 – 2045 Regional Transportation Plan / Sustainable Communities Strategy**.

Table III-1
Consistency Analysis with
2020–2045 Regional Transportation Plan / Sustainable Communities Strategy

Goals and Strategies	Consistency Assessment
2020-2045 RTP/SCS Goals	
Goal 1: Encourage regional economic prosperity and global competitiveness	**Consistent.** This Goal is directed at SCAG and the City of Los Angeles and therefore does not directly apply to the Proposed Project. Nevertheless, the Proposed Project would further this Goal by providing new creative office space suitable for tech and innovative uses consistent with the

2 Southern California Association of Governments. 2021. Variable Constrained Areas (VCAs) – SCAG Region. Available at: https://hub.arcgis.com/datasets/10938b4b749d4fb9af1b89e51ee8f314_1?geometry=-118.359%2C34.056%2C-118.319%2C34.069, accessed August 17, 2021.

Goals and Strategies	Consistency Assessment
	surrounding area, fostering global competitiveness. The Proposed Project would also further this goal by providing co-working spaces within some of the residential uses to allow for work-life flexibility. The Proposed Project would also provide a variety of housing options affordable for various income levels, including very low income and workforce households, furthering economic prosperity across the City's socioeconomic spectrum.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** The Proposed Project is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor retail uses within a HQTA as defined by SCAG and a TPA as defined by SB 743. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	**Consistent.** The Proposed Project would further this Goal. The Proposed Project is located immediately adjacent to the Metro E Line and co-locates people and jobs in close proximity to transit, which helps to reduce overall VMT and, as a result, GHG emissions. The Proposed Project includes a landscaped plaza connecting the Proposed Project directly to the Metro E Line station, thereby enhancing the preservation, security, and resilience of the public transit system. The Proposed Project also creates a bicycle path link further enhancing the resilience of the transportation network.

Goals and Strategies	Consistency Assessment
Goal 4: Increase person and goods movement and travel choices within the transportation system	**Consistent.** The Proposed Project furthers this Goal by providing a variety of transportation options and access thereto. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project includes a landscaped plaza connecting the Proposed Project directly to the Metro E Line station. The Proposed Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking.
Goal 5: Reduce greenhouse gas emissions and improve air quality	**Consistent.** The Proposed Project co-locates people and jobs immediately adjacent to a transit station and multiple bus lines, as well as provide bicycle and pedestrian amenities, thereby reducing VMT and, as a result, reducing GHG emissions and improving air quality. The Proposed Project will also implement additional transportation demand management strategies to further reduce GHG emissions, including a ride share program and educational materials regarding site-specific transportation options. In addition, the Proposed Project will implement a project design feature to increase the project's water and energy efficiency, which will further reduce air quality and GHG emissions. The Proposed Project would result in criteria air pollutant and GHG emissions during construction and operation. However, as will be set forth in detail in the SCEA, air pollutant emissions would not exceed SCAQMD significance thresholds and the Proposed Project's GHG emissions would be consistent with SCAG's Connect SoCal Plan and CARB's 2017 Scoping Plan.

Goals and Strategies	Consistency Assessment
Goal 6: Support healthy and equitable communities	**Consistent.** The Proposed Project meets this Goal by incorporating sustainable design features creating a healthy community for the residents. The low environmental footprint of the Proposed Project also contributes to the overall health of the region by generating fewer GHG emissions and minimizing use of water. Lastly, the Proposed Project enhances bicycle infrastructure through bike parking and access to the Expo Line Bike Path and Ballona Creek Bike Path, further contributing to healthy communities. The Proposed Project also furthers this Goal by providing affordable housing (to very low income and workforce households) immediately adjacent to jobs, transit, and bicycle, pedestrian, and other outdoor opportunities (Kenneth Hahn State Recreation Area and Baldwin Hills Scenic Overlook State Park located within one mile south of the Project Site), thus creating a more livable community for all income levels.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	**Consistent.** The Proposed Project would be located in proximity to public transit opportunities and would implement a transportation demand management (TDM) program. Further, the Proposed Project includes sustainable features to address climate adaptation, such as entirely electric buildings, ENERGY STAR appliances, LED lighting, purchasing 100% green power from the LADWP grid and constructing 100 electric vehicle (EV) parking spaces. The Proposed Project will also include short- and long-term bicycle parking spots, a rainwater collection cistern, and landscaping with drought tolerant plants.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	**Not Applicable.** This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase travel efficiency. The Proposed Project would advance this Goal with its enhancements to the public transit and bicycle network.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** The Proposed Project would construct 260 multi-family residential units of varying sizes. 22 units would be set aside for low-income residents and 7 for workforce households. The Proposed Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from

Goals and Strategies	Consistency Assessment
	Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project includes a landscaped plaza connecting the Proposed Project directly to the Metro E Line station. The Proposed Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Proposed Project would provide residents with immediate access to a multitude of public transit, pedestrian, and bicycling opportunities.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the Proposed Project. The Proposed Project would not interfere with this Goal as it is not located in an identified "constrained" area such as on agricultural land, open space, or tribal lands.[3]
2020-2045 RTP/SCS Growth Strategies	
Strategy 1: Focus growth near destinations and mobility options	**Consistent.** The Proposed Project is consistent with this Strategy in that it adds growth on a site with existing mobility options, including transit and bike and further enhances these options. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project includes a landscaped plaza connecting the Proposed Project directly to the Metro E Line station. The Proposed Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site and nearby access to the Ballona Creek bike path. The Proposed Project would promote access to public open space destinations with Kenneth Hahn State Recreation Area located within one mile south of the Project Site, as well as the Baldwin Hills Scenic Overlook

3 SCAG Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-03-plan.pdf?1604533568

Goals and Strategies	Consistency Assessment
	State Park. The Project site is also located within a HQTA and TPA, which are identified by SCAG as areas most suited for implementation of SCAG's growth strategies in part because they provide greater mobility options than non HQTAs and TPAs.
Strategy 2: Promote diverse housing choices.	**Consistent.** The Proposed Project would develop 260 multi-family residential units of varying sizes. Furthermore, 22 units would be set aside for low-income residents and 7 for workforce households.
Strategy 3: Leverage technology innovations	**Consistent.** The Proposed Project will be designed to be a zero-emission community and includes cutting edge sustainable design features including ENERGY STAR appliances, LED lighting, rainwater collection cistern, and the purchase of 100% green power from the LADWP grid. GHG emissions are categorized into three groups (or scopes). Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.[4] The Proposed Project will be designed to reach absolute zero carbon emissions by 2040 for Scope 1, 2 and 3 emissions. The residential and office buildings will be constructed with LEED Gold minimum standards and will meet operational performance ratings, such as FitWel. Therefore, the Proposed Project will exceed CalGreen and Title 24 Building Standards.
Strategy 4: Support implementation of sustainability policies	**Consistent.** The Proposed Project will be designed to be a zero-emission community and includes cutting edge sustainable design features including ENERGY STAR appliances, LED lighting, rainwater collection cistern, and the purchase of 100% green power from the LADWP grid. GHG emissions are categorized into three groups (or scopes). Scope 1 covers direct

4 Carbon Trust. *Briefing: What are Scope 3 Emissions?* Available online at: https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions#:~:text=Scope%201%20covers%20direct%20emissions,in%20a%20company's%20value%20chain., accessed May 26, 2021.

Goals and Strategies	Consistency Assessment
	emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.[5] The Proposed Project will be designed to reach absolute zero carbon emissions by 2040 for Scope 1, 2 and 3 emissions. The residential and office buildings will be constructed with LEED Gold minimum standards and will meet operational performance ratings, such as FitWel. Therefore, the Proposed Project will exceed CalGreen and Title 24 Building Standards.
Strategy 5: Promote a Green Region	**Consistent.** The Proposed Project would promote access to public open space with Kenneth Hahn State Recreation Area located within one mile south of the Project site, as well as the Baldwin Hills Scenic Overlook State Park. The Proposed Project also includes 34,214 SF of landscaped open space at the ground floor and enhancement of bicycle infrastructure through bike parking and access to the Expo Line Bike Path and Ballona Creek Bike Path, further contributing to healthy, greener communities. Furthermore, the Proposed Project will be designed to be zero emissions and incorporates numerous sustainable design features to achieve this Strategy.

Source: SCAG Connect SoCal 2020 – 2045 Regional Transportation Plan/ Sustainable Communities Strategy. Available at: https://scag.ca.gov/read-plan-adopted-final-plan, accessed August 18, 2021.

B. Transit Priority Project Criteria Analysis

SB 375 provides CEQA streamlining opportunities for certain TPPs. A TPP is a project that meets the following three criteria (see PRC, § 21155 (b)):

5 Carbon Trust. *Briefing: What are Scope 3 Emissions?* Available online at: https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions#:~:text=Scope%201%20covers%20direct%20emissions,in%20a%20company's%20value%20chain., accessed May 26, 2021.

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

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

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

As discussed below, the Proposed Project qualifies as a TPP pursuant to the criteria set by PRC § 21155.

Consistency with Criterion #1

The Proposed Project is a mixed-use development consisting of 260 multi-family units of varying types and sizes (26 studios, 143 one-bedroom units, 78 two-bedroom units, and 13 three-bedroom units). The residential building of the Proposed Project encompasses approximately 241,167 gross sf of the Proposed Project's total building sf of 481,408, or 50% of the total building square footage. The _Project contains 50% nonresidential uses and the FAR is 3:1 (3.00). As such, the Proposed Project is consistent with this Criterion.

Consistency with Criterion #2

The Project Site is approximately 3.5 acres. With 260 residential dwellings, the Proposed Project would achieve a density of approximately 73 units per acre. As such, the Proposed Project is consistent with this Criterion.

Consistency with Criterion #3

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

PRC Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Sections 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 21155 (b) states that a "major transit stop" is defined in PRC Section 21064.3, except

that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Proposed Project is located within an HQTA as defined by SCAG and a TPA as defined by SB 743.[6] The Project Site is located within one-half mile of the La Cienega / Jefferson Station of the Metro E Line light rail. Furthermore, the Proposed Project would be served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only). Of these bus lines, Metro Bus Line 105 would have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Proposed Project is consistent with this Criterion.

C. Incorporation of Feasible Mitigation Measures, Performance Standards, and Criteria From Prior Applicable EIRs

Public Resources Code Section 21151.2 requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The City has complied with PRC Section 21151.2 by reviewing all of the suggested mitigation measures in Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy) Program EIR[7] and the West Adams – Baldwin Hills – Leimert Community Plan EIR[8] for imposition on the Project. The mitigation measures were not imposed if the Project was found to be in substantial compliance with the mitigation measure as proposed or if the mitigation measures were found not to be relevant. If the Project was not found to be in substantial compliance or the mitigation measure was found relevant, the City considered whether to use the mitigation measure or an equally effective City mitigation measure (including the mitigation measures developed for this SCEA). The applicable mitigation measures, performance standards, or criteria from the aforementioned documents are discussed in **Table III-2, Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy) Applicable Mitigation Measures,** and **Table III-3, West Adams – Baldwin Hills -Leimert**

6 Southern California Association of Governments. High Quality Transit Areas (GQTA) 2016 – SCAG Region. Available at: https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0/explore, accessed August 18, 2021.

7 Southern California Association of Governments. Connect SoCal Program Environmental Impact Report. SCH #20199011061. Available at: https://scag.ca.gov/peir.

8 City of Los Angeles Planning Department. West Adams – Baldwin Hills- Leimert Community Plan EIR. SCH #2008021013. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html.

Community Plan Area EIR Applicable Mitigation Measures, below and are included in applicable technical analyses in **Section IV, Environmental Checklist of the SCEA**.

Table III-2
Connect SoCal (2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy)
Applicable Mitigation Measures

Project Level Mitigation Measure	Applicability to the Proposed Project
Aesthetics	
PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Project Site is located in an urbanized area within the City of Los Angeles. The Proposed Project is a transit-oriented mixed-use development that includes residential, office, and retail uses. The Project Site is located less than one-half mile from the Metro La Cienega/Jefferson station. Therefore, the Proposed Project is located in a transit priority area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

Project Level Mitigation Measure	Applicability to the Proposed Project
and exposed earth surfaces at the earliest opportunity; h) Use see-through safety barrier designs (e.g., railings rather than walls)	
PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Project Site is located in an urbanized area within the City of Los Angeles. The Proposed Project is a transit-oriented mixed-use development that includes residential, office, and retail uses. The Project Site is located less than one-half mile from the Metro La Cienega/Jefferson station. Therefore, the Proposed Project is located in a transit priority area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

Project Level Mitigation Measure	Applicability to the Proposed Project
f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: — use transparent panels to preserve views where sound walls would block views from residences; — use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; — construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the Project Site,	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Project Site is located in an urbanized area within the City of Los Angeles. The Proposed Project is a transit-oriented mixed-use development that includes residential, office, and retail uses. The Project Site is located less than one-half mile from the Metro La Cienega/Jefferson station. Therefore, the Proposed Project is located in a transit priority area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

Project Level Mitigation Measure	Applicability to the Proposed Project
and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	
Agriculture and Forestry	
PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank[9] that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.	This Mitigation Measure is not relevant to the Proposed Project as no farmland or agricultural activity exists on or in the vicinity of the Project Site. See **Section 2, Agricultural Resources**, of the **SCEA Environmental Checklist**, for further information.

9 The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking).

Project Level Mitigation Measure	Applicability to the Proposed Project
e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	
PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. See **Section 2, Agricultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.
PMM AG-3: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources**.**	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not zoned for agricultural production and there is no farmland at the Project Site. See **Section 2, Agricultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.
PMM AG-4: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland,	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not zoned for agricultural production and there is no

Project Level Mitigation Measure	Applicability to the Proposed Project
to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.	farmland at the Project Site. See **Section 2, Agricultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.
PMM AG-5: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in	This Mitigation Measure is not relevant to the Proposed Project as the Project Site is not zoned for agricultural production and there is no farmland at the Project Site. See **Section 2, Agricultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.

Project Level Mitigation Measure	Applicability to the Proposed Project
farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
Air Quality	
PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for	The Proposed Project is subject to the South Coast Air Quality Management District (SCAQMD) rules and mentioned in **Section 3, Air Quality,** of **Chapter IV, SCEA Environmental Checklist**. Upon compliance, the Project would satisfy the applicable requirements of this mitigation measure. The Projects impacts to Air Quality were analyzed **in Section 3, Air Quality, of Chapter IV, SCEA Environmental Checklist,** and were found to be less than significant and the Project would not require any mitigation measures for this impact.

Project Level Mitigation Measure	Applicability to the Proposed Project
approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet the Tier 4 Final engine	

Project Level Mitigation Measure	Applicability to the Proposed Project
certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations	

Project Level Mitigation Measure	Applicability to the Proposed Project
(e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the Proposed Project. **c.** Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce	

Project Level Mitigation Measure	Applicability to the Proposed Project
the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased.	

Project Level Mitigation Measure	Applicability to the Proposed Project
e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
Biological Resources	
PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as	This Mitigation Measure is not relevant to the Proposed Project as the Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City and is not identified as a vegetation zone that could serve as species' habitat. No mitigation is required for this impact.

Project Level Mitigation Measure	Applicability to the Proposed Project
identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during	

Project Level Mitigation Measure	Applicability to the Proposed Project
the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any	This Mitigation Measure is not relevant to the Proposed Project as the Project Site does not contain any 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, and/or Lead Agencies. See **Section 4, Biological Resources,** of **Chapter IV, SCEA Environmental Checklist,** for more information. No mitigation is required for this impact.

Project Level Mitigation Measure	Applicability to the Proposed Project
additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.	

Project Level Mitigation Measure	Applicability to the Proposed Project
k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	

Project Level Mitigation Measure	Applicability to the Proposed Project
PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the Proposed Project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource	This Mitigation Measure is not relevant to the Proposed Project as the Project Site does not contain any state or federally protected wetlands. See **Section 4, Biological Resources,** of **Chapter IV, SCEA Environmental Checklist,** for more information. No mitigation is required for this impact.

Project Level Mitigation Measure	Applicability to the Proposed Project
functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: — Permittee-responsible mitigation — Contribution of in-kind in-lieu fees — Use of in-kind mitigation bank credits d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: — Avoidance — Impact Minimization — On-site alternatives — Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted	This Mitigation Measure is not applicable to the Proposed Project as the Project is located in a developed urban area and does not involve the dispersal of wildlife nor would the project result in a barrier to migration or movement. The Project would also comply with the Migratory Bird Treaty Act which governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. No mitigation is required for this impact.

Project Level Mitigation Measure	Applicability to the Proposed Project
Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity	

Project Level Mitigation Measure	Applicability to the Proposed Project
mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: — Wildlife movement buffer zones — Corridor realignment — Appropriately spaced breaks in center barriers — Stream rerouting — Culverts	

Project Level Mitigation Measure	Applicability to the Proposed Project
— Creation of artificial movement corridors such as freeway under- or overpasses — Other comparable measures p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.	
PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.	Two trees would be removed as part of the Project. Both are pines with a trunk diameter of less than 8 inches. This species is neither native to California nor protected. Both trees would be replaced in accordance with the existing tree replacement requirements of the City's Division of Urban Forestry.

Project Level Mitigation Measure	Applicability to the Proposed Project
d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and	

Project Level Mitigation Measure	Applicability to the Proposed Project
other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: — Avoidance strategies — Contribution of in-lieu fees — Planting of replacement trees — Re-landscaping areas with native vegetation post-construction — Other comparable measures developed in consultation with local agency and certified arborist.	
PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and	This Mitigation Measure is not relevant to the Proposed Project as no habitat conservation plan or natural community conservation plans encompass the site and no locally designated natural communities occur on or adjacent to the Project Site. See **Section 4, Biological**

Project Level Mitigation Measure	Applicability to the Proposed Project
feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	**Resources, of Chapter IV, SCEA Environmental Checklist,** for further information.
Cultural Resources	
PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to *CEQA Guidelines* Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS)	**Historical Resources** The Proposed Project is not listed in the California Register of Historical Resources (CRHR), is not a California Point of Historical Interest (CPHI) and is not a California State Historical Landmark (CSHL). It has not been identified as a City of Los Angeles Historic Cultural Monument (HCM), and it is not located in a City Historic Preservation Overlay Zone (HPOZ). Furthermore, it is not listed in the National Register of Historic Places (NRHP). The Property has not previously been recorded by SurveyLA. The Historic Resources Assessment conducted for the Proposed Project did not find the industrial buildings at 3401 S. La Cienega Boulevard individually eligible or eligible as contributors to any historic district or potential historic district under NRHP/CRHR criteria A/1, B/2, C/3, or D/4, or the City's HCM criteria 1-4, nor as a CEQA-defined historical resource. Impacts on historical resources are less

Project Level Mitigation Measure	Applicability to the Proposed Project
in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: — Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. — Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian	than significant and no mitigation measures are required. See **Section 5, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** for further information. No mitigation is required for this impact. **Archaeological Resources** In compliance with mitigation measure **PMM CULT-1:**, the Lead Agency has considered mitigation measures consistent with Section 15064.5 of the *State CEQA Guidelines* and, accordingly, incorporated a comparable mitigation measure CR-7 which provides would mitigate potential archeological impacts. **Section 6, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** determined that several prehistoric sites had been previously documented in proximity to the Proposed Project and the NAHC search of the Sacred Lands File returned a positive result. The condition of the parcel and specifically the presence or absence of archaeological materials prior to the initial development and subsequent redevelopment on the Property is unknown. As such, conditions of approval related to archaeological resources have been added to the Proposed Project.

Project Level Mitigation Measure	Applicability to the Proposed Project
or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the Native American Heritage Commission (NAHC) to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on	

Project Level Mitigation Measure	Applicability to the Proposed Project
applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II	

Project Level Mitigation Measure	Applicability to the Proposed Project
evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.	

Project Level Mitigation Measure	Applicability to the Proposed Project
l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: — Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with	The Historic Resources Assessment Report did not note any previous use of the Project Site as part of a formal cemetery. The Proposed Project is also not included in the CRHR which includes criteria to determine the potential of the site to include information important to prehistory or history of the local area, California, or the nation such as historic or prehistoric human remains. Therefore, the Project Site is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the Proposed Project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Conditions of approval related to buried resources have been added to the Proposed Project. Therefore, impacts would be less than significant.

Project Level Mitigation Measure	Applicability to the Proposed Project
appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. — If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	
Geology and Soils	
PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geologic hazards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the California Building Code (CBC) and local regulatory agencies with oversight of development associated with the Connect SoCal Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior	As analyzed and concluded in **Section 7, Geology and Soils,** of **Chapter IV, SCEA Environmental Checklist**, the Project does not have the potential for significant effects related to the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides. Further, the Proposed Project already complies with this Mitigation Measure as it is subject to the building construction protocols for reducing seismic hazards as provided in the Los Angeles Municipal Code and applicable regulations. Compliance would help avoid or reduce the potentially significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic

Project Level Mitigation Measure	Applicability to the Proposed Project
to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. The Proposed Project would also comply with all seismic standards provided in the California Building Code as approved by the Department of Building and Safety. Impacts would be less than significant and no mitigation is required.
PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce	The Historic Resource Assessment Report did not identify the site as containing or having a potential to contain paleontological resources. Therefore, the Proposed Project is not expected to encounter a unique

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substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:	paleontological resource or unique geologic feature. Conditions of approval related to the protection of potential paleontological resources or unique geologic features have been added to the Proposed Project Mitigation Measure CR-9 provides procedures to follow in the event of accidental discovery of paleontological resources. As such, this mitigation measure is not applicable to the Project. See **Section 7, Geology and Soils**, of **Chapter IV, SCEA Environmental Checklist,** for further information.
PMM-GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as	Impacts regarding the generation of greenhouse gas emissions were analyzed in **Section 8, Greenhouse Gas Emissions,** in **Chapter IV, SCEA Environmental Checklist.** The Air Quality and Greenhouse Gas Report provides a detailed analysis demonstrating the Proposed Project's consistency with CARB's 2017 Scoping Plan and SCAG's

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applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions.	Connect SoCal Plan. The Proposed Project would have a less than significant GHG impact and therefore mitigation is not required. Nevertheless, the Proposed Project will include many of the GHG reduction measures identified in this project level mitigation measure. The Proposed Project is a transit-oriented development which places residences, amenities, and jobs within walking distance (100 feet) to the Jefferson/La Cienega Metro Expo station. The Proposed Project also plans to implement streetscape improvements and provide bicycle parking on-site to promote pedestrians and bicycle travel. In addition, the Proposed Project will implement a series of project design features that will reduce GHG emissions including installing ENERGY STAR appliances, LED lighting, a rainwater collection cistern, and EV parking. In addition, the proposed project intends to purchase 100% green power from the LADWP grid and landscape the site with drought tolerant plants.

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d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse; vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit;	

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iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;	

Project Level Mitigation Measure	Applicability to the Proposed Project
iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.	

Project Level Mitigation Measure	Applicability to the Proposed Project
Hazards and Hazardous Materials	
PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:	The Project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The Project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. Impacts were found to be less than significant as analyzed in **Section 9, Hazards and Hazardous Materials**, **of Chapter IV, SCEA Environmental Checklist**, and mitigation is not required.

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— The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. — The location of such hazardous materials. — An emergency response plan including employee training information. — A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.	

Project Level Mitigation Measure	Applicability to the Proposed Project
o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario / field-based training including Emergency Operations Center Training activations with local emergency response agencies.	
PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;	The Proposed Project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers and cleaning agents required for normal maintenance of the structure and landscaping. The Proposed Project must adhere to applicable zoning and fire regulations regarding the use and storage of any hazardous substances. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. This mitigation measure is therefore not applicable to the Proposed Project. Impacts were found to be less than significant as analyzed in **Section 9, Hazards and Hazardous Materials**, **of Chapter IV, SCEA Environmental Checklist**, and mitigation is not required.

Project Level Mitigation Measure	Applicability to the Proposed Project
h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	
PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	Echo Horizon Elementary School is within one-quarter mile from the Proposed Project. However, the Proposed Project does not involve hazardous emissions or the handling of hazardous materials, substance, or waste; Therefore, the Proposed Project would have no hazardous material related impacts to schools. This mitigation measure is not applicable to the Project.
PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning,	Searches conducted using the California State Water Resources Control Board Geotracker and the Department of Toxic Substances Control EnviroStor did not reveal any open cases for potentially hazardous sites within 1000 feet of the Project Site. The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist onsite. This mitigation measure is not applicable.

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environmental clearance, and construction for projects. b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the Project Site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks,	

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fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written	

Project Level Mitigation Measure	Applicability to the Proposed Project
verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS)	

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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.	
PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	Demolition, construction and operation of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the Proposed Project would have a less than significant impact with respect to these issues. This mitigation measure is not applicable.
Hydrology and Water Quality	
PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	Though the Proposed Project would add typical, urban, nonpoint source pollutants to stormwater runoff, the Proposed Project will comply with local regulations as required by the countywide MS4 permit regarding stormwater runoff. This would ensure the Proposed Project complies with this Mitigation Measure and would help avoid or reduce the potential impacts on water quality or related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies.

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a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the Project Site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system	As such, the Proposed Project would have a less than significant impact and no mitigation measures would be required. See **Section 10, Hydrology and Water Quality,** of **Chapter IV, SCEA Environmental Checklist,** for further information.

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discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	
PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of	Though the Proposed Project would add typical, urban, nonpoint source pollutants to stormwater runoff, the Proposed Project will comply with local regulations as required by the countywide MS4 permit regarding stormwater runoff. This would ensure the Proposed Project complies with this Mitigation Measure and would help avoid or reduce the potential impacts on water quality or related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. The Proposed Project would have a less than significant impact and no mitigation would be required. See **Section 10, Hydrology and Water Quality**, of **Chapter IV, SCEA Environmental Checklist**, for further information.

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surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	
PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	This mitigation measure is not applicable. Nonetheless, the Proposed Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Proposed Project. Further, the Proposed Project would be required to implement a LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event.
Land Use and Planning	
PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce	The site is surrounded by other residential development to the east of the Project Site and by existing commercial space to the south, north, and west. Immediately to the north and west of the Project Site are two

Project Level Mitigation Measure	Applicability to the Proposed Project
substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: — Selecting alignments within or adjacent to existing public rights of way. — Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. — Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: — Alignment shifts to minimize the area affected. — Reduction of the proposed right-of-way take to minimize the overall area of impact. — Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	new developments proposing mixed-use and office space, respectively. Accordingly, the site is surrounded by similar development on all sides and would not physically divide an existing community. The Project would in fact unite the surrounding uses by incorporating the existing bicycle path along Jefferson Blvd. into the Project design, providing a plaza directly connecting the Project Site to the Jefferson / La Cienega Metro station, and providing over 30,000 sf of publically accessible ground floor amenities to integrate the Project into the neighborhood. This mitigation measure is not applicable to the Project.
PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	This mitigation measure is not applicable to the Project as the Proposed Project would not physically divide an existing community (as explained above) and would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Project Level Mitigation Measure	Applicability to the Proposed Project
a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	
Mineral Resources	
PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the Project Site.	The Project Site has not been utilized for mineral extraction and is not located within an oil drilling district, state-designated oil filed or surface mining district, and there are no active mining operations on the Project Site or near the project vicinity. This mitigation measure is not applicable.

Project Level Mitigation Measure	Applicability to the Proposed Project
3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise	
PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and	In compliance with this mitigation measure, the Lead Agency has considered mitigation measures consistent with Section 15064.5 of the *State CEQA Guidelines* and, accordingly, incorporated a comparable mitigation measure. The implementation of **Mitigation Measure NOI-1**, which has been incorporated into the Project, would reduce noise impacts associated with the Proposed Project to a less than significant level. **MM NOI-1** is similar in that it requires the installation of sound barriers, noise reduction devices such as improved mufflers, and reduction of construction activity levels. **MM NOI-1** also includes a specific 13 decibel Leq minimum reduction level to ensure impacts from the Proposed Project would be less than significant.

Project Level Mitigation Measure	Applicability to the Proposed Project
off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.	

Project Level Mitigation Measure	Applicability to the Proposed Project
j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses; n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.	

Project Level Mitigation Measure	Applicability to the Proposed Project
q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible. y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce	In compliance with this mitigation measure, the Lead Agency has considered mitigation measures consistent with Section 15064.5 of the *State CEQA Guidelines* and, accordingly, incorporated a comparable

Project Level Mitigation Measure	Applicability to the Proposed Project
substantial adverse effects related to vibration, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	mitigation measure. The implementation of **Mitigation Measure NOI-1**, which has been incorporated into the Project, would reduce noise impacts associated with the Proposed Project to a less than significant level. **MM NOI-1** is similar in that it requires the installation of sound barriers, noise reduction devices such as improved mufflers, and reduction of construction activity levels. **MM NOI-1** also includes a specific 13 decibel Leq minimum reduction level to ensure impacts from the Proposed Project would be less than significant.
Population and Housing	
PMM-POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce the	The Project Site does not contain any existing dwelling units. Therefore, the Proposed Project would not displace existing housing and this mitigation measure is not applicable.

Project Level Mitigation Measure	Applicability to the Proposed Project
displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	
Public Services	
PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.	This mitigation measure is not applicable to the Project as the Proposed Project would not require the construction or alteration of emergency response facilities. See **Section 15, Public Services**, of **Chapter IV, SCEA Environmental Checklist**, for further information.

Project Level Mitigation Measure	Applicability to the Proposed Project
• Where current levels of services at the Project Site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	
PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	This mitigation measure is addressed as the Project would require fees to reduce impacts as to a less than significant impact. The Applicant would be required to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by statute to fully mitigate any potentially significant impact on schools.
P**MM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	This mitigation measure is not applicable as the Project would not cause a significant impact with regard to library services. As discussed in **Section 15, Public Services** of **Chapter IV, SCEA Environmental Checklist,** the addition of residential units at the Project Site would not be substantial enough to create additional impacts to existing services and the Project would not significantly impact library services and no new or expanded library facilities would be needed.

Project Level Mitigation Measure	Applicability to the Proposed Project
a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	
Recreation	
PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the Proposed Project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	Los Angeles Municipal Code Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents, with an exception made for affordable housing units. The Project will be required to comply with Los Angeles Municipal Code Section 12.33. The Project itself would not lead to substantial physical deterioration of any existing recreational facilities and would have no related significant impacts.

Project Level Mitigation Measure	Applicability to the Proposed Project
Transportation	
PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: — include TDM mitigation requirements for new developments; — incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; — provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; — implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; — develop TDM-specific performance measures to evaluate project-specific and system-wide performance;	As an infill development site, the Project has ready access to community resources, particularly public transportation. The site is serviced by the Metro (Expo) Line, directly abutting the Property, about 100 feet from the Jefferson/La Cienega Metro stop. Additionally, there are several major bus routes running along Jefferson and La Cienega Boulevards. The strategic location of this Project is to lessen VMT to and from the site. The Proposed Project encourages non-motorized travel through provision of short- and long-term bicycle parking and will promote transit usage by complying with the City's TDM Ordinance. Transportation impacts were concluded to be less than significant with mitigation measure TR1. See **Section 17, Transportation**, of **Chapter IV, SCEA Environmental Checklist,** for further information.

Project Level Mitigation Measure	Applicability to the Proposed Project
— incorporate TDM performance measures in the decision-making process for identifying transportation investments; — implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and — set aside funding for TDM initiatives. — The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	
PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to	The Project would not include any change in intersection or roadway design. Moreover, the Project would not include unusual or hazardous design features that are atypical to large scale commercial and residential developments. The Proposed Project thus is not anticipated to substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, and therefore this mitigation measure is not applicable to the Proposed Project.

Project Level Mitigation Measure	Applicability to the Proposed Project
construction. Traffic control plans can and should include the following requirements: — Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. — Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. — Scheduling of truck trips outside of peak morning and evening commute hours. — Limiting of lane closures during peak hours to the extent possible. — Usage of haul routes minimizing truck traffic on local roadways to the extent possible. — Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. — Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. — Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and	

Project Level Mitigation Measure	Applicability to the Proposed Project
duration of construction activities and the locations of detours and lane closures. — Storage of construction materials only in designated areas. — Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. — Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. — Enhance emergency preparedness awareness among public agencies and with the public at large.	
Tribal Cultural Resources	
PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the	In compliance with this mitigation measure, the Lead Agency has considered mitigation measures consistent with Section 15064.5 of the *State CEQA Guidelines* and, accordingly, incorporated a comparable mitigation measure. Conditions of Approval, in Section 18, Tribal Cultural Resources, of **Chapter IV, SCEA Environmental Checklist**, would reduce impacts to tribal cultural resources to a less than significant level.

Project Level Mitigation Measure	Applicability to the Proposed Project
traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	
Utilities and Service Systems	
PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an	The Project would generate solid waste that is typical of retail and mixed-use residential buildings and would comply with all federal, state, and local statutes and regulations regarding proper disposal. As concluded in **Section 19, Utilities and Service Systems** of **Chapter IV, SCEA Environmental Checklist**, the Proposed Project would have a less than significant impact and no mitigation would be required. Furthermore, the Proposed Project would already incorporate 2019 California Green Building Standards Code (CALGreen) requirements.

Project Level Mitigation Measure	Applicability to the Proposed Project
adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could	

Project Level Mitigation Measure	Applicability to the Proposed Project
include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
PMM-USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the Proposed Projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	Project Applicant shall be required to implement applicable LA Green Building Code requirements. As concluded in **Section 19, Utilities and Service Systems,** of **Chapter IV, SCEA Environmental Checklist,** the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Impacts would be less than significant, and this mitigation measure is not applicable.
PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by	This mitigation measure is not applicable for the Proposed Project. Impacts from the Project on water supply are analyzed in **Section 19, Utilities and Service Systems**, of **Chapter IV, SCEA Environmental Checklist**. Impacts were found to be less than significant and therefore, mitigation is not required.

Project Level Mitigation Measure	Applicability to the Proposed Project
shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	
Wildfire	
PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the	The Project Site is not located within a Very High Fire Hazard Severity Zone. As analyzed in **Section 20, Wildfire**, of **Chapter IV, SCEA Environmental Checklist**, there would be a less than significant impact and no mitigation is required.

Project Level Mitigation Measure	Applicability to the Proposed Project
chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place	
PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to — Submit a fire protection plan including the designation of fire watch staff; — Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; — Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and — Designate trained fire watch staff during project construction to reduce risk of fire hazards.	This mitigation measure is not applicable to the Proposed Project as impacts would be less than significant. Being in a developed urban area, there are several fire protection facilities in the Project vicinity that could respond to an emergency at the site. As analyzed in **Section 20, Wildfire**, of **Chapter IV, SCEA Environmental Checklist**, there would be a less than significant impact and no mitigation is required.

Source: SCAG Connect SoCal (2020 – 2045 Regional Transportation Plan/ Sustainable Communities Strategy.

Table III-3
West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures

Mitigation Measure	Applicability to the Project
Aesthetics	
AE1: As a condition of approval for any Discretionary or "Active Change Area Project," as defined in Section 3.4 of the Project Description, the City shall require new construction located on commercial or industrial planned land in CPIO subdistricts and the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residential planned land to transition in the following manner: • Where the rear or side property line is contiguous with that of a residential property, the structure shall be set back or "stepped back" one foot for every one foot in height as measured fifteen feet above grade at the shared property line. • Where the properties are separated by an alley, the structure shall be set back or "stepped back" one foot for every one foot in height as measured from grade at the residential property line. • Adjustments and Exceptions (permitted): The height limitation at the residential property line may be increased by not more than 20 percent through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.	This Mitigation Measure is not relevant to the Proposed Project as Public Resources Code Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." The Project Site is located in an urbanized area within the City of Los Angeles. The Proposed Project is a transit-oriented mixed-use development that includes residential, office, and retail uses. The Project Site is located less than one-half mile from the Metro La Cienega/Jefferson station. Therefore, the Proposed Project is located in a transit priority area as defined in Public Resources Code Section 21099. The Proposed Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nonetheless, this mitigation measure is not applicable as the Proposed Project as the Project Site does not abut or site directly across an alley from residential land.
AE2: As a condition of approval for any Discretionary or "Active Change Area Project" as defined in Section 3.4 of the Project Description, the City shall require that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.	This Mitigation Measure is incorporated into the Project as a condition of approval.
AES: As a condition of approval for any Discretionary or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require that glare effects be limited by using non-reflective building and construction materials, such as concrete, wood, and stucco.	This Mitigation Measure is incorporated into the Project as a condition of approval.

Mitigation Measure	Applicability to the Project
This shall include, but not be limited to, art installations, fencing material, and recreational equipment.	
Air Quality	
AQ1: As a condition of approval for any Discretionary or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require all contractors to include the following best management practices in contract specifications: • Use properly tuned and maintained equipment. • Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations. • Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible. • Use heavy duty diesel-fueled equipment that uses low NOX diesel fuel to the extent it is readily available and feasible. • Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible. • Maintain construction equipment in good operating condition to minimize air pollutants. • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. • Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.	This Mitigation Measure is incorporated into the Project as a condition of approval.

Mitigation Measure	Applicability to the Project
• Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic. • Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter). • Construction contractors shall utilize materials that do not require painting, as feasible. • Construction contractors shall use pre-painted construction materials, as feasible. • Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. • Construction contractors shall provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, as feasible • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.	
Biological Resources	
BR1: As a condition of approval for any Discretionary or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require that in order to prevent the disturbance of nesting native and/or migratory bird species, all clearing of a project site should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), qualified biologists shall survey the area within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of the construction activity to determine if construction would disturb	This Mitigation Measure is incorporated into the Project as a condition of approval.

Mitigation Measure	Applicability to the Project
nesting birds. If nesting activity is being compromised, construction shall be suspended in the vicinity of the nest until fledging is complete. This mitigation measure shall be implemented by a qualified biologist under contract with the project applicant(s). The project biologist should prepare a report detailing the results of the construction monitoring efforts. The report should be submitted to the California Department of Fish and Game (CDFG) within two months of the completion of the monitoring activities.	
BR2: As a condition of approval for any Discretionary or "Active Change Area Project", as defined in Section 3.4 of the Project Description, the City shall require that during the final design phase of the Proposed Project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the Project Site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.	The Proposed Project would be subject to the provisions of City's Protected Tree Ordinance and by complying therewith, would be in compliance with this Mitigation Measure. The two existing trees are both Pine species with a trunk diameter of less than 8 inches. This species is neither native to California nor protected. The two trees would be replaced in accordance with the existing tree replacement requirements of the City's Division of Urban Forestry. Impacts would be less than significant.
Cultural Resources	
CR1: Before approval of a Discretionary project or "Active Change Area Project" involving properties designated as Historic-Cultural Monuments or listed in or determined eligible for the National Register or California Register, the project shall be reviewed by the Department of City Planning Office of Historic Resources.	The Proposed Project is not listed in the California Register of Historical Resources (CRHR), is not a California Point of Historical Interest (CPHI) and is not a California State Historical Landmark (CSHL). It has not been identified as a City of Los Angeles Historic Cultural Monument (HCM), and it is not located in a City Historic Preservation Overlay Zone (HPOZ). Furthermore, it is not listed in the National Register of Historic Places (NRHP). The Property has not previously been recorded by SurveyLA. The Historic Resources Assessment conducted for the Project did not find the industrial buildings at 3401 S. La Cienega Boulevard are individually eligible or eligible as contributors to any historic district or potential historic district under NRHP/CRHR criteria A/1, B/2, C/3, or D/4, or City of Los Angeles Historic-Cultural Monument (HCM) criteria 1-4, nor as a CEQA-defined historical resource. Impacts

Mitigation Measure	Applicability to the Project
	on historical resources are less than significant and no mitigation measures are required. See **Section 5, Cultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.
CR2: Before approval of any building permits for a Discretionary project or "Active Change Area Project", developed in a Historic Preservation Overlay Zone, the City shall require written approval from the Department of City Planning Office of Historic Resources	The Proposed Project is not listed in the California Register of Historical Resources (CRHR), is not a California Point of Historical Interest (CPHI) and is not a California State Historical Landmark (CSHL). It has not been identified as a City of Los Angeles Historic Cultural Monument (HCM), and it is not located in a City Historic Preservation Overlay Zone (HPOZ). Furthermore, it is not listed in the National Register of Historic Places (NRHP). The Property has not previously been recorded by SurveyLA. The Historic Resources Assessment conducted for the Project did not find the industrial buildings at 3401 S. La Cienega Boulevard individually eligible or eligible as contributors to any historic district or potential historic district under NRHP/CRHR criteria A/1, B/2, C/3, or D/4, or City of Los Angeles Historic-Cultural Monument (HCM) criteria 1-4, nor as a CEQA-defined historical resource. Impacts on historical resources are less than significant and no mitigation measures are required. See **Section 5, Cultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, for further information.
CR3: Before approval of a Discretionary project or "Active Change Area Project", involving properties identified in the SurveyLA Historic Resources Survey Report: "West Adams – Baldwin Hills - Leimert Community Plan Area" as eligible for listing, the City of Los Angeles Office of Historic Resources (OHR) shall find that the project is consistent with the U.S. Secretary of the Interior's Standards for Rehabilitation or that upon further review or study, the property is not eligible for designation as a historic resource.	The Proposed Project is not listed in the California Register of Historical Resources (CRHR), is not a California Point of Historical Interest (CPHI) and is not a California State Historical Landmark (CSHL). It has not been identified as a City of Los Angeles Historic Cultural Monument (HCM), and it is not located in a City Historic Preservation Overlay Zone (HPOZ). Furthermore, it is not listed in the National Register of Historic Places (NRHP). The Property has not previously been recorded by SurveyLA. The Historic Resources Assessment conducted for the Project did not find the industrial buildings at 3401 S. La Cienega Boulevard individually eligible or eligible as contributors to any historic district or potential historic district under NRHP/CRHR criteria A/1, B/2, C/3, or D/4, or City of Los Angeles Historic-Cultural Monument (HCM) criteria 1-4, nor as a CEQA-defined historical resource. Impacts on

Mitigation Measure	Applicability to the Project
	historical resources are less than significant and no mitigation measures are required. See **Section 5, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** for further information.
CR4: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that prior to excavation and construction on a Proposed Project Site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the Proposed Project Site to contain sensitive protected cultural resources.	The Proposed Project is not listed in the California Register of Historical Resources (CRHR), is not a California Point of Historical Interest (CPHI) and is not a California State Historical Landmark (CSHL). It has not been identified as a City of Los Angeles Historic Cultural Monument (HCM), and it is not located in a City Historic Preservation Overlay Zone (HPOZ). Furthermore, it is not listed in the National Register of Historic Places (NRHP). The Property has not previously been recorded by SurveyLA. The Historic Resources Assessment conducted for the Project did not find the industrial buildings at 3401 S. La Cienega Boulevard individually eligible or eligible as contributors to any historic district or potential historic district under NRHP/CRHR criteria A/1, B/2, C/3, or D/4, or City of Los Angeles Historic-Cultural Monument (HCM) criteria 1-4, nor as a CEQA-defined historical resource. Impacts on historical resources are less than significant and no mitigation measures are required. See **Section 5, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** for further information.
CR5: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that prior to excavation and construction on a proposed Project Site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Proposed Project Site.	**Section 6, Cultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, determined that several prehistoric sites had been previously documented in proximity to the Proposed Project and the NAHC search of the Sacred Lands File returned a positive result. This Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval.
CR6: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if during any phase of project construction any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to	**Section 6, Cultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, determined that several prehistoric sites had been previously documented in proximity to the Proposed Project and the NAHC search of the Sacred Lands File returned a positive result. This Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval.

Mitigation Measure	Applicability to the Project
conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the Project Site.	
CR7: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.	**Section 6, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** determined that several prehistoric sites had been previously documented in proximity to the Proposed Project and the NAHC search of the Sacred Lands File returned a positive result. This Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval.
CR8: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.	**Section 6, Cultural Resources,** of **Chapter IV, SCEA Environmental Checklist,** determined that several prehistoric sites had been previously documented in proximity to the Project and the NAHC search of the Sacred Lands File returned a positive result. This Mitigation Measure is incorporated into the Project as a Condition of Approval.
CR9: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.	**Section 6, Cultural Resources**, of **Chapter IV, SCEA Environmental Checklist**, determined that several prehistoric sites had been previously documented in proximity to the Proposed Project and the NAHC search of the Sacred Lands File returned a positive result. This Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval.
CR10: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if human remains are unearthed at a project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. No further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be those of a Native	As concluded in **Section 6 Cultural Resources,** of **Chapter IV, SCEA Environmental** Checklist, there are no known human remains on the site. The Project Site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction of the Proposed Project. In the unlikely event that human remains are encountered during project construction, State Health and Safety Code Section 7050.5 requires the Project to halt until the County Coroner has made the necessary findings as to the origin and

Mitigation Measure	Applicability to the Project
American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.	disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations, as well as applicable Conditions of Approval would ensure the Proposed Project would not disturb human remains. This Mitigation Measure is incorporated into the Project as a Condition of Approval.
Greenhouse Gas Emissions	
GHG1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that the following greenhouse gas reduction measures are incorporated into the project design" • Install energy efficient lighting (e.g., light emitting diodes), heating and cooling systems, appliances, equipment, and control systems). • Install light colored "cool" roofs and cool pavements. • Create water-efficient landscapes. • Install water-efficient fixtures and appliances.	Impacts regarding the generation of greenhouse gas emissions were analyzed in **Section 8, Greenhouse Gas Emissions**, in **Chapter IV, SCEA Environmental Checklist.** This Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval.
Hazards and Hazardous Materials	
HM1: Any approval of a Discretionary project or "Active Change Area Project" that involves new construction that will involve soil disturbance shall ensure that a Phase I Environmental Site Assessment (ESA) is prepared. The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a	In compliance with this mitigation measure, a Phase I ESA and a Phase II ESA were conducted. Two additional mitigation measures have been incorporated into the Project (See Measures HAZ-1 in Hazards and Hazardous Materials). With implementation of HAZ-1 impacts related to hazardous materials would be less than significant.

Mitigation Measure	Applicability to the Project
condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.	
Noise and Vibration	
N1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all contractors include the following best management practices in contract specifications: • Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences • The construction contractor shall locate construction staging areas away from sensitive uses • When construction activities are located in close proximity to noise sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses. • Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving. • Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.	In compliance with this mitigation measure, the Lead Agency has considered mitigation measures consistent with Section 15064.5 of the *State CEQA Guidelines* and, accordingly, incorporated a comparable mitigation measure. The implementation of **Mitigation Measure NOI-1**, which has been incorporated into the Proposed Project, would reduce noise impacts associated with the Proposed Project to a less than significant level. **MM NOI-1** is similar in that it requires the installation of sound barriers, noise reduction devices such as improved mufflers, and reduction of construction activity levels. **MM NOI-1** also includes a specific 13 decibel Leq minimum reduction level to ensure impacts from the Proposed Project would be less than significant.
N2: Prior to any approval of a Discretionary project or "Active Change Area Project" that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, or within a Historic Preservation	As discussed in **Section 13, Noise,** of **Chapter IV, SCEA Environmental Checklist**, the See's Candies building located to the south of the Project Site is assumed to be a historic resource. As such, this Mitigation Measure is incorporated into the Proposed Project as a Condition of Approval, which would ensure the Proposed Project has a less than significant impact.

Mitigation Measure	Applicability to the Project
Overlay Zone ("historic buildings"), the City shall ensure all of the following requirements are or will be met: • Historic buildings adjacent to the project's construction zones are identified. • A Vibration Control Plan is prepared and approved by the City • The Vibration Control Plan shall be completed by a qualified structural engineer. • The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).	
N3: Any approval of a Discretionary project or "Active Change Area Project" that includes industrial uses located within 1,000 feet of a residential land use shall ensure that a noise study is completed that uses the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future). Identified impacts shall be mitigated per the City's Noise Ordinance or through any measures identified in the noise study.	The Proposed Project does not include industrial land uses located within 1,000 feet of a residential land use. This mitigation measure is not applicable.
Public Services	
PS1: Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan shall be reviewed at the discretion of the Los Angeles Police Department (LAPD). Per department standards, the LAPD will	This mitigation measure is included as a condition of approval for the Proposed Project.

Mitigation Measure	Applicability to the Project
determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.	
PS2: Subject to available resources and funding, the City shall prioritize the implementation of recreation and park projects in parts of the West Adams Community Plan Area with the greatest existing deficiencies.	Los Angeles Municipal Code Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents, with an exception made for affordable housing units. The Proposed Project will comply with code requirements.
PS3: Subject to available resources and funding, the City shall establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the West Adams Community Plan Area.	This mitigation measure is addressed as the project would require fees to reduce impacts as to a less than significant impact. The Applicant would be required to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by statute to fully mitigate any potentially significant impact on schools.
Subject to available resources and funding, the City shall monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the West Adams Community Plan Area.	Los Angeles Municipal Code Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents, with an exception made for affordable housing units. The Proposed Project will comply with these code requirements. The Proposed Project itself would not lead to substantial physical deterioration of any existing recreational facilities and would have no related significant impacts.

Source: West Adams-Baldwin Hills-Leimert New Community Plan Final EIR 2016.

IV. SCEA ENVIRONMENTAL CHECKLIST

A. Environmental Factors Potentially Affected

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

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

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the Project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least 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 the 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 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 as identified in the Initial Study contained herein, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) contains measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.	**X**

Printed Name	Title
Signature	Date

B. Evaluation of Environmental Impacts

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

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

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

4) "Negative Declaration: Less than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, "Earlier Analysis," may be cross-referenced). When all impacts can be reduced to less than significant, a Mitigated Negative Declaration (MND) or Sustainable Communities Environmental Assessment (SCEA) can be prepared.

5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See *CEQA Guidelines* Section 15063(c)(3)(D). Earlier analyses are discussed in **Section 21** at the end of the checklist.

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

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

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

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

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

8) The explanation of each issue should identify:

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

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

C. Environmental Impacts (explanations of all answers are required):

1. Aesthetics

In January 2016, the City of Los Angeles Planning Department provided guidance in the form of Zoning Information File ZI No. 2451 regarding Transit Priority Areas (TPAs) and analysis of Aesthetics and Parking impacts within TPAs pursuant to CEQA, as established in State Senate Bill 743 (SB 743).

Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. [1] Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.

Section 21099 (a) of the PRC defines the following terms:

(1) "Employment center project" (TPAs) means 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.

(4) "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% 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.

(7) "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned.

Section 21064.3 of the PRC defines a "major transit stop" as a site containing any of the following: an existing rail or rapid bus 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

[1] City of Los Angeles Department of City Planning. Zoning Information File No. 2451. Available at: https://www.alston.com/files/docs/ZI%202451-TPA-Aesthetics-and-Parking.pdf, accessed August 20, 2021.

frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

For purposes of Section 21099(a)(7) of the PRC, a “transit priority area” also includes major transit stops in the City of Los Angeles that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) 2020- 2045 Regional Transportation Plan / Sustainable Community Strategy (2040-2045 RTP/SCS).

The Project is an infill development in that it is proposed on a previously developed site adjoined to urban uses. The Project contains a mix of uses (residential, office, and retail) and is located within a half-mile of an existing major transit stop, with the La Cienega/Jefferson Metro stop located less than 100 feet from the Project Site. Furthermore, the Project is served by Metro Bus Lines 105 which has a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. For these reasons, the Project qualifies for this exemption, and the analysis below is provided for **informational purposes only.** For context, photos of the site are presented in **Figure IV-1.**

Facing West

Facing Northwest

Facing East

Facing Southwest

SOURCE: Impact Sciences, Inc., 2021.

FIGURE **IV-1**

IMPACT SCIENCES

Photographs of the Project Site

1346.001•08/2021

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. This discussion is for informational purposes only. The Project is located in a highly urbanized area in the City of Los Angeles. The Project Site is surrounded by a mix of industrial, commercial, retail, and residential uses contained in low-rise (1- to 2-story) structures, which are physically separated from the Project Site by major highways, secondary streets, and arterial roadways.

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private property. The City of Los Angeles CEQA Thresholds do not protect views available from private vantage points such as private offices or private homes.

The Project Site is bound by West Jefferson Boulevard to the north, existing office buildings to the west, South La Cienega Boulevard on the east, and an existing See's Candy retail/manufacturing building along Corbett Street to the south. The elevated Metro E Line and bicycle path runs directly north of the Project Site parallel to West Jefferson Boulevard, with the La Cienega/Jefferson Metro stop at the south side of the intersection between West Jefferson and La Cienega Boulevards.

The West Adams-Baldwin Hills-Leimert Community Plan lists the nearest prominent vistas and view sheds as coming from the Baldwin Hills, a half-mile south of the Project Site.[2] The Baldwin Hills Scenic Overlook provides a panoramic view of the Los Angeles Basin, the Pacific Ocean, and surrounding mountains. The Project would be viewable to the north from the Baldwin Hills Scenic Overlook, and as such, there is the possibility that the Project could block a portion of the view of the Los Angeles Basin looking north, as viewed from this location. However, the Project would only block a small portion of this view and the remainder of the northern Los Angeles Basin would still be viewable from the Scenic Overlook. Further, the Baldwin Hills Scenic Overlook is an elevated, aerial view of the Los Angeles Basin and therefore contains a very large viewing area. Due to

2 City of Los Angeles Department of City Planning. West Adams-Baldwin Hills-Leimert Community Plan. 2016. Available at: https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf

the viewpoint's elevation, the Project will not interfere with a view of any portions of the Los Angeles Basin except for minimal portions of the urban landscape including the elevated Metro Line and other development near the Project Site, none of which are considered scenic resources. Therefore, as a person stands at different locations at the Scenic Overlook, different portions of the Los Angeles Basin would be in view, and the majority of the Los Angeles Basin would remain viewable from the Baldwin Hills Scenic Overlook even with development of the Project.

In addition, the Los Angeles Basin, and the area surrounding the Project Site, contain many other buildings significantly taller than the Project will be, including a 320-foot-tall tower currently under construction at the corner of Jefferson and La Cienega Boulevards (the Cumulus project) and the (W)rapper tower, which would be approximately 230 feet in height, currently under construction at the corner of Jefferson and National Boulevards, both of which are also viewable from the Baldwin Hills Scenic Overlook. Accordingly, the Project will not increase the height of the existing skyline and would not affect any scenic vista from this vantagepoint.

Additional publicly available views include views from the existing Metro E Line station and the E Line trains running east-west by the Project Site. From the elevated Metro E Line station and the trains, the Project Site is visible to the south. The Project would alter portions of the view from the station and the trains. The views of the Project Site would improve, as the views would change from the existing Public Storage facility with nine low rise buildings with minimal landscaping to the Proposed Project's architecturally unique buildings and abundant landscaped terraces and ground floor landscaping and open space. Further, the design of the Project includes space between the residential and office building that would continue to allow views of the Baldwin Hills from the station and the train.

The Project's impacts with respect to scenic vistas would be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. This discussion is for informational purposes only. No officially designated or eligible State-designated scenic highways are located adjacent to, or within

view of, the Project Site.[3] As stated below under "Biological Resources," the Project Site does not contain any protected trees. Further, the Project Site does not contain any rock outcroppings. Finally, as discussed below under "Cultural Resources," the Project would not result in any impacts with respect to historic resources. Therefore, the Project would have no impact to scenic resources.

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. This discussion is for informational purposes only. As the Project is located within an urbanized area, a consistency analysis with the West Adams-Baldwin Hills-Leimert Community Plan regarding regulations governing scenic quality was completed. **Table IV-1** shows the Project's consistency with applicable regulations.

Table IV-1
Consistency with Regulations Governing Scenic Quality in the West Adams-Baldwin Hills-Leimert Community Plan

Community Plan Policy	Consistency Analysis
LU 2-1 Protect Neighborhoods. Strive to protect existing single-family and low-density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	**Consistent.** The Project would not encroach on existing single-family and low-density residential neighborhoods. The closest low-density residential neighborhoods lie approximately 500 feet northeast of the Project Site and 700 feet southeast of the Project Site. The Project would develop a mixed-use project within a transit priority area adjacent to the La Cienega/Jefferson Metro Station, thereby meeting the policy to encourage higher residential densities near light rail transit stations (Community Plan Policy **LU 11-1 Higher Density Residential Near Transit),** as outlined

[3] California Department of Transportation. State Scenic Highway Map. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 19, 2021.

Community Plan Policy	Consistency Analysis
	below. In addition, the Project is located within an area with several new, large developments proposed in close proximity, including a 320-foot-tall tower (the Cumulus project) currently under construction at the corner of Jefferson and La Cienega Boulevards and the (W)rapper tower, which would be approximately 230 feet in height. The Project is therefore consistent with, and appropriately placed in relation to, surrounding uses and development.
LU 2-5 Preserve View Corridors. Encourage the preservation of existing prominent public vistas and view corridors throughout the Community Plan Area and especially those from hillside areas.	**Consistent.** As analyzed above, views from the Baldwin Hills Scenic Overlook would not be adversely affected. As the majority of the Los Angeles Basin would remain viewable from the Baldwin Hills Scenic Overlook even with development of the Project, the Project's impacts with respect to scenic vistas would be less than significant.
LU 11-1 Higher Density Residential Near Transit. Encourage higher residential densities near commercial centers, light rail transit stations and major bus routes where public service facilities, utilities and topography will accommodate this development.	**Consistent.** The Project would develop a mixed-use, 260-unit, 13-story residential building within a transit priority area directly adjacent to the La Cienega/Jefferson Metro Station consistent with the policy to encourage higher residential densities near light rail stations.
M 13-1 Scenic Highways. Encourage implementation of designated scenic highways and support future designation of both adopted and recommended study corridor scenic highway designations.	**Not Applicable.** This policy is directed to the City to implement programs and encourage future designation of scenic highways. As noted above, no officially designated or eligible State-designated scenic highways are located adjacent to, or within view of, the Project Site. The Project would not interfere with this policy.
CF 13-1 Street Tree Canopy. Identify protecting and developing tree cover as a priority and encourage setting a target for street tree canopy cover in new developments and/or in areas identified as tree deficient.	**Consistent.** The Project would add a net increase of 80 trees to the Project Site, including 3 street trees. The street trees will be subject to replacement requirements to the satisfaction of the Department of Public Works, Urban Forestry Division. As such the project would be consistent with and substantially further this policy.

The Project provides for an arrangement of buildings and structures, and other improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood. The Project Site and the surrounding area belongs to a burgeoning creative digital and entertainment community of buildings and users including, Nike, the Tennis Channel, Converse, Blur Studio, WeWork, and others in the

nearby vicinity. Neighboring buildings in the Project vicinity range in height from one to three stories up to 17 and 30 stories (and 230 to 320 feet in height), which are taller than the Proposed Project which is expected to be up to 149'-6".

The Project will also provide development that is consistent with, and will support the needs of, the existing West Adam-Baldwin Hills-Leimert community. The Project will provide much needed affordable housing, including very-low income and workforce, in furtherance of the City's Housing Element goals, and will provide job opportunities and neighborhood-serving retail, all in close proximity to transit. The Project's design will also improve the scenic quality of the existing neighborhood. The Project's abundant publicly accessible open space with seating and extensive shading and landscaping will benefit the community and will be a substantial increase from the current limited landscaping on the Project Site. The Project's plazas, paseos, and ground floor retail aim to activate the streetscape along West Jefferson Boulevard along a stretch that is currently fenced off from public access. The mix of residential and retail uses would increase pedestrian activity in this neighborhood on the evenings and weekends, creating a more vibrant community. The landscaped, pedestrian-oriented plazas and tree-lined squares will improve and beautify the Jefferson/La Cienega Metro station and existing bicycle path, encouraging active modes of transportation for the community at large.

Further, as demonstrated in **Table IV-1**, the Project would be consistent with applicable regulations in the West Adams-Baldwin Hills-Leimert Community Plan. Therefore, impacts would be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. This discussion is for informational purposes only. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly

reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Project would include lighting designed to highlight architectural elements of the structures. Security lighting would be installed to deter criminal activity on the Project Site. The lights associated with the Project would be directed toward the interior of the Project Site so as not to create impacts to surrounding land uses or motorists traveling on surrounding roadways. All exterior lighting would be designed with internal and/or external glare control and would also be designed, arranged, directed, or shielded to contain direct illumination on-site, thereby preventing excess illumination and light spillover onto adjacent land uses and/or roadways. Blinking, flashing, or oscillating lights would be prohibited. Due to the anticipated height of the buildings, light generated from the interior of the buildings (one or both) could potentially be seen from outside the immediate vicinity of the Project Site. However, the increase in light that would be generated would not be out of character with the existing light sources in the Project vicinity given the Project is located in a heavily urbanized area and adjacent to properties with taller buildings.

In addition, the Project will be required to incorporate lighting design specifications to meet City standards as outlined in Section 93.0117 of the LAMC.[4] LAMC Section 93.0117 states that no exterior light source may cause more than two footcandles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas on any other property containing a residential unit or units. Further, the project would incorporate mitigation measures from the West Adams – Baldwin Hills – Leimert Community Plan EIR as conditions of approval.[5] The full list of applicable mitigation measures is provided in **Table III-3, West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures**. Mitigation Measure AE2 which requires lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties, will be incorporated into the Proposed Project; therefore, all lighting from the Project would be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties. Mitigation Measure AE3 which requires use of non-reflective building materials will be incorporated into the Proposed Project. As such, nighttime views in the Project vicinity would not be affected by the Project and impacts with respect to lighting would be less than significant.

4 Los Angeles Municipal Code Section 93.0117. Available at: https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-183817, accessed August 20, 2021.

5 City of Los Angeles Planning Department. West Adams-Baldwin Hills-Leimert New Community Plan EIR. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html, accessed August 20, 2021.

The Project's architectural features and facades would not be constructed of highly reflective materials, and therefore would not be expected to affect daytime views. Materials used on the façade of the proposed office building would utilize glass on the façade which would not be highly reflective.

Therefore, Project impacts related to light or glare will be less than significant.

2. Agricultural 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.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Farmland Mapping and Monitoring Program (FMMP) indicates that the Project Site is Urban and Built-Up Land and does not have any properties that contain prime or important farmland.[6] There are no properties within the West Adams – Baldwin Hills - Leimert Community Plan Area that are zoned for important farmland or are considered agriculture land uses. Vegetation within the Project Site consists largely of two non-native ornamental trees, that are typical of urban

6 California Department of Conservation. California Important Farmland Finder. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/

landscaping. Therefore, implementation of the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. No impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is within the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan Area and is designated as Hybrid Industrial which corresponds to the Property's zoning of Commercial Manufacturing within a Community Plan Implementation Overlay [CM-2D-CPIO]. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site or within the West Adams-Baldwin Hills-Leimert Community Plan Area . Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the Project would not conflict with existing agricultural zoning or a Williamson Act Contract. 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))?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. As discussed above the Project Site is zoned Commercial Manufacturing within a Community Plan Implementation Overlay [CM-2D-CPIO]. The site and the surrounding area do not contain any forest land or land zoned for timberland production, nor is the Project Site used for such uses. There are no timberlands in the vicinity of the West Adams – Baldwin Hills – Leimert Community Plan Area and there is no forest land defined as timberland or timberland production within the Community Plan Area according

to the West Adams – Baldwin Hills – Leimert Community Plan EIR.[7] Therefore, implementation of the Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. See response to Section 2(c) above.

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[8] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[9] As there are no agriculture or forestry resources within the Project Site or the entirety of the West Adams-Baldwin Hills-Leimert Community Plan Area, the Proposed Project would not cause a loss of forest land or timberland. 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

7 City of Los Angeles Planning Department. West Adams-Baldwin Hills-Leimert New Community Plan EIR. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html, accessed August 20, 2021.

8 California Public Resources Code Section 12220[g]

9 California Public Resources Code Section 4526

No Impact. See responses to Sections 2(a) through 2(d), above. The site is in an urbanized area and there are no agricultural uses or related uses on the site or in the surrounding area. No impact would occur.

3. Air Quality

The analysis provided below is primarily based on technical data prepared in the Air Quality and Greenhouse Gas Technical Study prepared by Impact Sciences, Inc., September 2021 (refer to **Appendix B** of this SCEA).

Introduction

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. The City of Los Angeles is located within the South Coast Air Basin (SCAB), which incorporates approximately 12,000 square miles consisting 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 South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the Basin. Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the South Coast Air Quality Management District (SCAQMD). Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model version 2016.3.2 (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to quantify criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

Air Pollution Climatology

The SCAB is in an area of high pollution potential due to the climate and topography of the region. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average with speeds. The area is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The annual average temperature varies little throughout the SCAB region, ranging from the low 60s to the high 80s, measures in degrees Fahrenheit (F°).

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is higher during the dry summer months than during the rainy winter. Between periods of wind, air stagnation may occur in both the morning and evening hours.

Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two similarly distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the "mixing height." The combination of winds and inversions is a critical determinant leading to highly degraded air quality in the summer and generally good air quality in the winter in Los Angeles.

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O3), nitrogen dioxide (NO2), carbon monoxide (CO), sulfur dioxide (SO2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NOx) are not classified as criteria pollutants. However, ROGs and NOx are widely emitted from land development projects and participate in photochemical reactions in the atmosphere to form O3; therefore, NOx and ROGs are relevant to the Project and are of concern in the air basin and are listed below along with the criteria pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table IV-2, Criteria Pollutants Summary of Common Sources and Effects**.

Table IV-2
Criteria Pollutants Summary of Common Sources and Effects

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuels is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include moto vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone O_3)	Formed by a chemical reaction between volatile organic compounds (VOC) and nitrous oxides (NOx) in the presence of sunlight. VOCs are also commonly referred to as reactive organic gases (ROGs). Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM10 & PM2.5)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned; when gasoline is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant; aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.

Source: California Air Pollution Control Officers Association (CAPCOA), Health Effects. Available: http://www.capcoa.org/health-effects/, 2021

Air Monitoring Data

Ambient air quality in Los Angeles can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. Existing levels of ambient air quality and historical trends and projections in the vicinity of Los Angeles are documented by measurements made by the South Coast Air Quality Management District (SCAQMD),

the air pollution regulatory agency in the SCAB regions maintains air quality monitoring stations which process ambient air quality measurements.

The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM10 and PM2.5) are pollutants of particular concern in the SCAB. The monitoring station located closest to the Project Site and most representative of air quality near the Project Site is the Los Angeles – North Main Street station, located at 1630 North Main Street approximately 6.44 miles east of the Project Site. Ambient emission concentrations vary due to localized variations in emissions sources and climate and should be considered "generally" representative of ambient concentrations near the Project Site. The Los Angeles – North Main Street station monitors O_3, PM2.5, PM10, and NO_2, see **Table IV-3, Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations**.

Table IV-3
Los Angeles – North Main Street Air Monitoring Station Ambient Pollutant Concentrations

Pollutant	Standards[1]	Year		
		2017	2018	2019
OZONE (O_3) [2]				
Maximum 1-hour concentration monitored (ppm)		0.116	0.098	0.085
Maximum 8-hour concentration monitored (ppm)		0.086	0.073	0.080
Number of days exceeding state 1-hour standard	0.09 ppm	6	2	0
Number of days exceeding federal/state 8-hour standard	0.070 ppm	14	4	2
NITROGEN DIOXIDE (NO_2)				
Maximum 1-hour concentration monitored (ppm)		0.081	0.070	0.069
Annual average concentration monitored (ppm)		0.021	0.018	0.018
Number of days exceeding state 1-hour standard	0.18 ppm	0	0	0
RESPIRABLE PARTICULATE MATTER (PM_{10})				
Maximum 24-hour concentration monitored ($\mu g/m^3$)		64.6	68.2	62.0
Annual average concentration monitored ($\mu g/m^3$)		25.7	30.2	25.5
Number of samples exceeding state standard	50 $\mu g/m^3$	40	31	3
Number of samples exceeding federal standard	150 $\mu g/m^3$	0	0	0
FINE PARTICULATE MATTER ($PM_{2.5}$)				
Maximum 24-hour concentration monitored ($\mu g/m^3$)		54.9	61.4	43.5

Pollutant	Standards[1]	Year		
		2017	2018	2019
Annual average concentration monitored ($\mu g/m^3$)		12.0	12.8	10.8
Number of samples exceeding federal standard	35 $\mu g/m^3$	6	6	1

Source: California Air Resources Board, "Air Quality Data Statistics," http://www.arb.ca.gov/adam/. 2020.
South Coast Air Quality Management District. 2019. Air Quality South Coast Air Quality Management District. Available online at: http://www.aqmd.gov/docs/default-source/air-quality/historical-data-by-year/2019-air-quality-data-tables.pdf?sfvrsn=8. 2020.

[1] Parts by volume per million of air (ppm), micrograms per cubic meter of air ($\mu g/m^3$), or annual arithmetic mean (aam).

[2] The 8-hour federal O_3 standard was revised from 0.075 ppm to 0.070 ppm in 2015. The statistics shown are based on the 2015 standard of 0.070 ppm.

The attainment status for the SCAB region is included in **Table IV-4, Attainment Status of Criteria Pollutants in the South Coast Air Basin**. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. The SCAB region is designated as a nonattainment area for federal ozone, PM2.5, and lead standards and designated as nonattainment for state ozone, PM10, and PM2.5 standards.

Table IV-4
Attainment Status Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
Ozone (O_3)	Non-Attainment	Non-Attainment
Particulate Matter (PM10)	Non-Attainment	Attainment
Particulate Matter (PM2.5)	Non-Attainment	Non-Attainment
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Lead	Attainment	Non-Attainment (Partial)[1]

Source: South Coast Air Quality Management District. 2016. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin. naaqs-caaqs-feb2016.pdf, accessed March 2021.

[1] The Los Angeles County portion of the SCAB is designated as a non-attainment area for the federal lead standard on the basis of source-specific monitoring at two locations as determined by U.S. Environmental Protection Agency (EPA) using 2007-2009 data. However, all stations in the SCAB, including the near-source monitoring in Los Angeles County, have remained below the lead NAAQS for the 2012 through 2015 period. The SCAQMD will request that the U.S. EPA re-designate the Los Angeles County portion of the SCAB as attainment for lead.

Regulatory Setting

Federal

Clean Air Act

The Clean Air Act (CAA) of 1970 and the CAA Amendments of 1971 required the U.S. Environmental Protection Agency (EPA) to establish NAAQS, with states retaining the option to adopt more stringent standards or to include other specific pollutants. On April 2, 2007, the Supreme Court found that carbon dioxide is an air pollutant covered by the CAA; however, no NAAQS have been established for carbon dioxide.

These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

The EPA has classified air basins (or portions thereof) as being in attainment, nonattainment, or unclassified for each criteria air pollutant, based on whether or not the NAAQS have been achieved. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designations. **Table IV-4** lists the federal attainment status of the SCAB for the criteria pollutants.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 187 substances are currently listed as hazardous air pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) program. The EPA is establishing regulatory schemes for specific source categories and requires implementation of the Maximum Achievable Control Technologies (MACT) for major sources of HAPs in each source category. State law has established the framework for California's Toxic Air Contaminants (TAC) identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are a problem in California. The state has formally identified 244 substances as TACs and is adopting appropriate control measures for each. Once adopted at the state level, each air district will be required to adopt a measure that is equally or more stringent.

National Ambient Air Quality Standards

The federal CAA required the U.S. EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants**.** Primary standards define limits for the intention of protecting public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings. A summary of the federal ambient air quality standards is shown in **Table IV-5, National Ambient Air Quality Standards**.

Table IV-5
National Ambient Air Quality Standards

Pollutant		Primary/Secondary	Averaging Time	Level
Carbon Monoxide		Primary	8 hours	9 ppm
			1 hour	35 ppm
Lead		Primary and secondary	Rolling 3-month average	0.15 µg/m^3
Nitrogen dioxide		Primary	1 hour	100 ppb
		Primary and secondary	Annual	0.053 ppm
Ozone		Primary and secondary	8 hours	0.070 ppm
Particulate Matter	PM2.5	Primary	Annual	12 µg/m^3
		Secondary	Annual	15 µg/m^3
		Primary and secondary	24 hours	35 µg/m^3
	PM10	Primary and secondary	24 hours	150 µg/m^3
Sulfur dioxide		Primary	1 hour	75 ppb
		Secondary	3 hours	0.5 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

State

California Clean Air Act of 1988

Under the Federal Clean Air Act, California is authorized to enforce its own vehicle emissions standards, despite the preemption which prohibits states from enacting emission standards. The emissions standards are established through the California CAA of 1988 (CCAA). The CCAA, through the grant of waivers by the Federal CAA adopts ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. CARB, a part of the California Environmental Protection

Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all air quality management districts (AQMDs) in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and include state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards. California has also set standards for some pollutants that are not addressed by federal standards. The state standards for ambient air quality are summarized in **Table IV-6, California Ambient Air Quality Standards**.

Table IV-6
California Ambient Air Quality Standards

Pollutant		Averaging Time	Level
Carbon monoxide		8 hours	9 ppm
		1 hour	20 ppm
Lead		30-day average	1.5 µg/m^3
Nitrogen dioxide		1 hour	0.180 ppm
		Annual	0.030 ppm
Ozone		8 hours	0.070 ppm
		1 hour	0.09 ppm
Particulate matter	PM2.5	Annual	12 µg/m^3
	PM10	24 hours	50 µg/m^3
		Annual	20 µg/m^3
Sulfur dioxide		1 hour	0.25 ppm
		24 hours	0.04 ppm
Sulfates		24 hours	25 µg/m^3
Hydrogen sulfide		1 hour	0.03 ppm
Vinyl chloride		24 hours	0.01 ppm

Source: California Air Resources Board. May 2016. Ambient Air Quality Standards. Available online: https://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed January 12, 2021.

California State Implementation Plan

The federal CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a SIP. The SIP is a living document that is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. Amendments to the CAA[10] dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The U.S. EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register. The 2016 Air Quality Management Plan (2016 AQMP) is the SIP for SCAB. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SCAB and those portions of the Salton Sea Air Basin (SSAB) that are under the SCAQMD's jurisdictions. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnerships with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The most effective way to reduce air pollution impacts is to reduce emissions from mobile sources. The AQMP relies on regional and multi-level partnerships of governmental agencies at the federal, state, regional, and local level. Those agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. The 2016 AQMP includes integrated strategies and measures to meet the NAAQS.

10 The legal authority for federal programs regarding air pollution control is based on the 1990 Clean Air Act Amendments (1990 CAAA). These are the latest in a series of amendments made to the Clean Air Act (CAA). This legislation modified and extended federal legal authority provided by the earlier Clean Air Acts of 1963 and 1970.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020-2045 RTP/SCS). However, the forecasts and measures in the plan have not been incorporated into any applicable air quality plan for the region.[11]

Regional

South Coast Air Quality Management District

The SCAQMD is the air pollution control district for Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The agency's primary responsibility is ensuring that the SCAB region meets attainment for the federal and state air quality standards. The SCAQMD is responsible for preparing an air quality management plan in order to meet federal attainment status. The SCAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, and conducting public education campaigns, as well as many other activities. All projects are subject to SCAQMD rules and regulations in effect at the time of construction.

SCAQMD Rules and Regulations

The following is a list of noteworthy SCAQMD rules that are required of construction activities associated with the Proposed Project:

- **Rule 402 (Nuisance)** – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403 (Fugitive Dust)** – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to

11 Southern California Association of Governments. *Adopted Final Connect SoCal* (2020-2045 RTP/SCS). Available online at: https://scag.ca.gov/read-plan-adopted-final-plan.

reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM10 suppression techniques are summarized below.

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- **Rule 1113 (Architectural Coatings)** – This rule requires manufacturers, distributors, and end-uses of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

- **Rule 445 (Wood-Burning Devices)** – The purpose of this rule is to reduce the emission of particulate matter from wood-burning devices and establish contingency measures for applicable ozone standards for the reduction of volatile organic compounds.

  The rule requires that any new residential or commercial development that begins construction on or after March 9, 2009, only install gaseous-fueled fireplaces and stoves.[12]

12 South Coast Air Quality Management District. 2019. *Rule 445 – Wood Burning Devices Local Government, Builder, Contractor, Architect Answers to Frequently Asked Questions (FAQs).* Available online at: http://www.aqmd.gov/docs/default-source/rule-book/support-documents/rule-445/detailed-rule-445-information.pdf.

Local

Air Quality Element of the City of Los Angeles General Plan

The *Air Quality Element of the City of Los Angeles General Plan* (Air Quality Element) was adopted on November 24, 1992, and sets forth the goals, objectives, and policies that guide the City in the implementation of its air quality improvement programs and strategies.[13] The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area's residents are crucial to the achievement of State and Federal air quality standards.

Relevant to the Proposed Project, the Air Quality Element establishes the following goals and policies aimed to reduce air quality emissions across the City of Los Angeles:

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

> **Objective 1.1.** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
>
> > **Policy 1.1.1.** Encourage demonstration projects which involve creative and innovative uses of market incentive mechanisms to achieve air quality objectives.
>
> **Objective 1.3.** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
>
> > **Policy 1.3.1.** Minimize particulate emissions from construction sites.
> >
> > **Policy 1.3.2.** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.

13 City of Los Angeles Planning Department. 1992. *Air Quality Element*. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

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

Objective 2.2. It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.

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

Objective 3.2. It is the objective of the City of Los Angeles to reduce vehicular traffic during peak periods.

Policy 3.2.1. Manage traffic congestion during peak periods.

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.

Policy 4.1.1. Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Policy 4.1.2. Ensure that project level review and approval of land use development remain at the local level.

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.

Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.

Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4. Require that air quality impacts to be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

West Adams, Baldwin Hills, Leimert Community Plan

The West Adams – Baldwin – Leimert Community Plan was updated in 2016 and includes the Crenshaw District and the neighborhoods of Leimert Park, Hyde Park, Jefferson Park, Mid-City, West Adams, and Arlington Heights. Through a collaborative effort involving residents, owners, businesses, and developers, a Long-Range Plan was developed to set forth actions to achieve a common vision that encompasses the full spectrum of issues and opportunities regarding the Community Plan Area's physical evolution. The Community Plan addresses a wide range of topics including jobs and housing, parks and open space, urban design and mobility, as well as arts, culture, history, and health.[14]

According to Appendix G of the *State CEQA Guidelines*, impact related to air quality would be considered significant if the project would:

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the

[14] Los Angeles Department of City Planning. 2016. *West Adams – Baldwin Hills – Leimart Community Plan*. Available online at: https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf.

federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project Site is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP.[15] As described above, the 2016 AQMP was developed in coordination with CARB, SCAG, and the U.S. EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieve CAAQS and NAAQS. The plan's pollutant control strategies are based on SCAG's 2016 RTP/SCS. While SCAG adopted the updated 2020 RTP/SCS (Connect SoCal) in September 2020, it has not been incorporated into an applicable air quality plan.[16]

Criteria for determining consistency with the 2016 AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following:

- **Consistency Criterion No. 1:** The proposed project will not result in an increase in the frequency or severity of an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

- **Consistency Criterion No. 2:** The proposed project will not exceed the assumptions in the AQMP or increments based on the years of the project build-out phase.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under Impacts 2 and 3 below, the Project would not exceed the applicable short-term construction standards or long-term operational standards and therefore would not violate the air quality standards included in **Table IV-2** and **Table IV-3**. Thus, no significant impact would occur, and the Proposed Project would be consistent with first criterion.

15 South Coast Air Quality Management District. 2016. *Air Quality Management Plan*. Available online at: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

16 Southern California Association of Governments. 2020. *Adopted Final Connect SoCal*. Available online at: https://scag.ca.gov/read-plan-adopted-final-plan.

Concerning Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans.

The 2020 RTP/SCS estimated that from 2016 to 2045 the City of Los Angeles is expected to increase in population by 837,500 people and add 287,600 jobs.[17] The Department of City Planning refines the City's allocation for each plan area. The West Adams-Baldwin Hills-Leimert Community Plan Area is expected to grow by 214,012 people and add 53,556 jobs by 2040.[18] The Proposed Project, which would increase local population by 744 residents and 1,284 employees, is consistent with the land use designation and development density prepared in the City of Los Angeles' General Plan, specifically the growth projections for the West Adams – Baldwin Hills – Leimert Community Plan. As a result, the Project would be adding less than 1% of the projected population growth and approximately 2.4% of the projected employment growth in the West Adams – Baldwin Hills – Leimert Community Plan Area. Therefore, the Project would not exceed the population or job growth projections used by the SCAMQD to develop the 2016 AQMP.[19,20] Thus, no significant impact would occur, as the Proposed Project is also consistent with the second criterion.

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 ?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A project may have a significant impact if project-related emissions would result in a cumulatively considerable net increase for an criteria pollutant for which the region in nonattainment under applicable federal or state ambient air quality

17 SCAG. 2020. *Connect SoCal Demographics and Growth Forecast*. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

18 Los Angeles Department of City Planning. 2016. *West Adams – Baldwin Hills – Leimert Community Plan*. Available online at: https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf.

19 Estimated population based on CalEEMod modeling, see Air Quality and Greenhouse Gas Technical Report Estimated employment numbers based on the Los Angeles Unified School District 2020 Developer Fee Justification Study for Standard Commercial Office which estimates 4.79 employees per 1,000 square feet.

20 Los Angeles Unified School District. 2020. 2020 Developer Fee Justification Study. Available online at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf.

standards. To determine if a project would have a cumulatively considerable air quality impact on the project's region, emissions are compared to the SCAQMD construction and operational air quality thresholds. A full discussion of criteria pollutants and modeling assumptions is provided in the Air Quality and Greenhouse Gas Technical Study, see **Appendix B, Air Quality and Greenhouse Gas Technical Study**.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and NOx), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance.

The Proposed Project will be required to implement Mitigation Measure AQ1 from the West Adams – Baldwin Hills – Leimert Community Plan EIR. Mitigation Measure AQ1 (See **Table III-3 West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures)** includes the following best management practices:

- Use properly tuned and maintained equipment.
- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NOX diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.
- Maintain construction equipment in good operating condition to minimize air pollutants.
- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all

construction equipment shall be outfitted with Best Available Control Technologies devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.

These best management practices are assumed as part of the Proposed Project. Predicted maximum daily construction-generated emissions for the Proposed Project are summarized in **Table IV-7, Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day.**

Table IV-7
Construction-Related Criteria Pollutant and Precursor Emissions – Maximum Pounds per Day

Construction Year	ROG	NOx	CO	SO2	PM10	PM2.5
2022	3.41	64.02	31.90	0.21	8.90	2.78
2023	3.46	44.00	30.32	0.20	8.81	2.47
2024	34.55	13.06	27.22	0.12	8.80	2.46
2025	34.45	2.26	15.27	0.05	5.68	1.57
Regional Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Impact Sciences, CalEEMod modeling, 2021. See **Appendix B, Air Quality and Greenhouse Gas Technical Study**.
Note: During construction, contractors are required to comply with SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust).

Operational Emissions

Project-generated emissions would be associated with motor vehicle use and area sources, such as the use of landscape maintenance equipment and architectural coatings associated with the Proposed Project. The Proposed Project includes a series of sustainable project design features (PDFs) that focus on increasing the water and energy efficiency of the new development, see **PDF 1.** Long-term operational emissions attributable to the Proposed Project are summarized in **Table IV-8, Long-Term Operational Emissions – Maximum Pounds per Day**.

Table IV-8
Long-Term Operational Emissions – Maximum Pounds per Day

Source	ROG	NOx	CO	SO2	PM10	PM2.5
Area Source	11.39	0.25	21.55	0.001	0.12	0.12
Energy Use	0.16	1.40	0.87	0.01	0.11	0.11
Mobile Source	4.76	21.72	61.76	0.25	23.59	6.44
Total	16.32	23.37	84.16	0.26	24.82	6.67
Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

Source: Impact Sciences, CalEEMod modeling, 2021. See **Appendix B, Air Quality and Greenhouse Gas Technical Study**.

As shown in **Table IV-7** and **Table IV-8**, neither the Project's construction nor operational emissions would exceed the SCAQMD's thresholds for any criteria air pollutants. Therefore, regional construction and operational emissions would not result in a significant air quality impact. Thus, the Proposed Project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.

Air Quality Health Impacts

The following discussion analyzes the Proposed Project's potential impacts to inform the public how the impacts' quantitative results translate to a potential adverse health impact and explains how existing scientific constraints cannot translate the emissions numbers to the potential health impacts.

SCAB is in state non-attainment for PM2.5, PM10, and O_3 and federal non-attainment for PM2.5 and O_3. Therefore, an increase in emissions of particulate matter or ozone precursors (ROG and NOx) has the potential to push the region further from reaching attainment status and, as a result, are the pollutants of greatest concern in the region. As noted in **Table IV-7** and **Table IV-8** above, the Proposed Project will emit criteria air pollutants during construction and operation**.** However, the Proposed Project will not exceed SCAQMD thresholds for ozone precursors (ROG and NOx), PM2.5, PM10, or any other criteria air pollutants, and will not result in a cumulatively significant impact for which the region is in non-attainment. This discussion focuses on the health effects from the pollutants for which the region is in non-attainment and why it is not feasible to provide an analysis to relate the emissions of ozone precursors from an individual project to likely human health consequences.

Exposure to particulate matter can affect both a person's lungs and heart and has been linked to a variety of health problems including aggravated asthma, decreased lung function, and increased respiratory symptoms. Diesel Particulate Matter (DPM) is a type of particulate that is emitted from diesel engines and is estimated to cause approximately 70% of total known cancer risks related to air toxics in California.[21] As discussed below, see **Impact C,** the Proposed Project would not result in an increased health risk as a result from exposure to DPM or other TACs. Further, since the Proposed Project will not exceed SCAQMD regional thresholds for particulate matter, the Project will not result in a cumulatively significant impact to particulate matter in the region.

Exposure to O_3 can cause respiratory irritation, lung damage, aggravate asthma, and may worsen existing chronic lung diseases such as emphysema and chronic bronchitis.[22] O_3 is formed in the atmosphere when heat and sunlight cause a chemical reaction between NOx and ROG emissions. NOx and ROG are referred to as ozone precursors and affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Proposed Project's less than significant increases in regional air pollution would not have a measurable effect on the human health implications of the SCAB's ambient air quality.

The Congressional Research service prepared the *Background Ozone: Challenges in Science and Policy* report for the U.S. Congress in 2019. The report provides a summary of the scientific capabilities of measuring ozone and understanding the needs and improvements necessary to understand contributions from background sources. While this paper specifically addresses background concentrations of ozone and ozone modeling, it demonstrates the difficulty in assessing ozone and related health implications from any single source or project. According to the Congressional Research Service, currently there are several data and analytical challenges to reliably assess background ozone concentrations and to model ozone. First, the current understanding of the amount, location, and type of pollutant emissions from many types of sources is insufficient. Therefore, inventories typically provide estimation, which may not be precise enough for apportioning contributions. Second, meteorological data (i.e., wind speed, wind direction, temperature, cloud cover, humidity, etc.) is not currently measured at a fine enough spatial scale to adequately represent relevant weather processes. Third, data on pollutant

21 California Air Resources Board. *Overview: Diesel Exhaust & Health*. Available online at: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

22 U.S. Environmental Protection Agency. *Ozone and Your Health*. Available online at: https://www.airnow.gov/sites/default/files/2020-02/ozone-c.pdf.

concentrations are limited, which increases the challenges of understanding ozone formation and movement. Fine spatial and temporal measurements are needed both horizontally across the surface and vertically to higher levels of the atmosphere. Finally, background ozone source contributions change by year, season, day, and hour and from location to location.[23]

While several models and tools are available to quantify emissions, these models are limited by a number of factors in their ability to determine health impacts of individual development projects. The U.S. Environmental Protection Agency currently performs health impact assessments (HIAs) using the Community Multiscale Air Quality (CMAQ)[24] model for pollutant transport modeling and Environmental Benefits Mapping and Analysis Program – Community Edition (BENMAP – CE) for health impact calculations.[25] However, these models are designed to estimate health impacts over a large scale (e.g., city-wide, state-wide). In addition, the CMAQ model requires inputs such as regional sources of pollutants and global meteorological data, which are not readily accessible. In general, the current suite of available models are not able to accurately model concentrations or dispersion of ozone because they are regional models unable to provide accurate results for individual projects. If reliable ozone concentrations can be determined, there is also a limitation on being able to correlate concentrations to related health effects.

The SCAQMD acknowledges that quantifying the health impacts from O_3 is difficult. The *2012 AQMP* determines that a reduction of 432 tons (864,000 pounds) per day of NOx and a reduction of 187 tons (374,000 pounds) per day of VOC would reduce O_3 levels at the highest monitored site by only nine parts per billion.[26] This means that a large reduction in precursor emissions translate to incremental reductions in measured ozone. Therefore, quantifying O_3 and related O_3 health impacts caused by NOx or VOC emissions from relatively small projects (defined as projects with regional scope) is limited. Thus, as the Proposed Project would not exceed SCAQMD thresholds for construction and operational air emissions, it can reasonably be concluded that the Proposed Project would not have a measurable effect on the human health in the SCAB,

23 Congressional Research Service. 2019. *Background Ozone: Challenges in Science and Policy.* Available online at: https://fas.org/sgp/crs/misc/R45482.pdf.

24 U.S. Environmental Protection Agency. *CMAQ: Community Multiscale Air Modeling System*. Available online at: https://www.epa.gov/cmaq.

25 U.S. Environmental Protection Agency. *Environmental Benefits Mapping and Analysis Program – Community Edition (BenMAP – CE)*. Available online at: https://www.epa.gov/benmap.

26 SCAQMD. *Final 2012 AQMP*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan.

nor would the Proposed Project have implications on ambient air quality. As a result, the Proposed Project would have a less than significant impact for air quality health impacts.

Project Design Features (PDFs)

PDF 1: The following sustainable features aimed at reducing air quality and GHG emissions will be incorporated into the project design:

- Entirely electric buildings – no natural gas (residential and commercial building)
- ENERGY STAR appliances for both residential and commercial buildings
- LED lighting for both residential and commercial buildings
- Intend to purchase 100% green power from the Los Angeles Department of Water and Power grid[27]
- Variable Air Volume (VAV) heating, ventilating, and air conditioning (HVAC) system in the Commercial Building with MERV 13-15 filter
- 100 Electric vehicle (EV) parking spaces
- Exploring on-site photovoltaic (PV) and battery storage
- Bike showers, lockers, and storage
- Rainwater collection cistern for stormwater management for reuse in landscaping on site
- Landscape with drought tolerant plants
- Commitment to using SCAQMD super-compliant low-VOC paint

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

27 Green Power is electricity produced from clean, sustainable energy sources such as the wind, water, and the sun. Source: Los Angeles Department of Water and Power

Less than Significant Impact. The Proposed Project has the potential to expose nearby sensitive receptors to air toxics during construction and operation. A full discussion of the impacts is provided in **Appendix B, Air Quality and Greenhouse Gas Technical Study.**

Localized Significance Thresholds

It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons are protected. In other words, the ambient air quality standards are purposely set in a stringent manner to protect children, elderly, and those with existing and respiratory problems. Thus, air quality health impacts would be less than significant.

Construction

The nearest sensitive receptors to the Project Site are residents located approximately 175 feet southeast of the Project Site across South La Cienega Boulevard. To identify impacts to sensitive receptors, the SCAQMD recommends addressing localized significance thresholds (LST) for construction.

LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAMQD provided the *Final Localized Significance Threshold Methodology* for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with project-specific analysis.

The applicable site receptor area (SRA) for the LST is the Northwest Coastal LA County area (SRA 2) since this area includes the Project Site. LSTs apply to CO, NO_2, PM10, and PM2.5. The SCAMQD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. The Project Site is approximately 3.53-acres; therefore, the LST threshold for two acres most closely aligns with the Project and was used for the construction LST analysis.

The SCAQMD's methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs."[28] Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. As stated above, the nearest sensitive receptors are approximately 175 feet southeast of the Project Site. LST screening thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters.

28 SCAQMD. 2008. *Final Localized Significance Threshold Methodology*. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2.

Therefore, LSTs for receptors located at 50 meters (approximately 164 feet) were used in this analysis.

Table IV-9, Localized Significance of Construction Emissions – Maximum Pounds per Day, presents the Project's localized emissions during construction activity. As shown in **Table IV-9**, the on-site air pollutant emissions on the peak day of construction (with assumed compliance of SCAQMD Rule 403) would not exceed the applicable LST. Therefore, the Proposed Project's localized construction air quality impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Table IV-9
Localized Significance of Construction Emissions – Maximum Pounds per Day

Construction Year	NOx	CO	PM10	PM2.5
2022	12.88	15.44	0.58	0.49
2023	11.30	15.41	0.52	0.43
2024	2.39	3.94	0.08	0.08
2025	1.15	1.81	0.05	0.05
LST Screening Threshold	**143**	**1,213**	**19**	**5**
Exceed?	***No***	***No***	***No***	***No***

Source: Impact Science, CalEEMod modeling, 2021. See Appendix A.
SCAQMD. Appendix C Mass Rate Look Up Tables. Available online at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2.
Note: The table provides the on-site construction emissions with implementation of SCAQMD Rules 402 and 403.

Operation

According to the SCAQMD LST methodology, LST would apply to the operational phase of a proposed project only if the proposed project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). The Project is proposing a residential and commercial development and, therefore, does not include such land uses. Thus, due to the lack of queuing and idling emissions, no long-term localized significance threshold analysis is needed. The Proposed Project's operational localized operational air quality impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Localized Air Quality Health Impacts

As evaluated above, the Project's air emissions would not exceed the SCAQMD's LST thresholds. Therefore, the Project would not cause or contribute to an exceedance of the most stringent applicable NAAQS or CAAQS for emissions of CO, NOx, PM10, or PM2.5.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and attainment area for state standards. CO emissions have declined in recent years even as VMT has increased. Estimated anthropogenic CO emissions have decreased 68% between 1990 and 2014. In 2014, mobile sources accounted for 82% of the nation's total anthropogenic CO emissions.[29] Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 ppm, the CAAQS for 8-hour ozone. The SCAQMD prepared a detailed CO analysis in the *Federal Attainment Plan for Carbon Monoxide* as part of the 2003 AQMP.[30] The 2003 AQMP is the most recent AQMP that addresses CO concentrations. The CO analysis included microscale modeling of CO at the worst-case intersections in SCAB. Of these locations, the Wilshire Boulevard and Veteran Avenue intersection in Los Angeles experienced the highest CO concentration of 4.6 ppm. At the time of analysis, the Wilshire Boulevard and Veteran Avenue intersection was the most congested intersection in Los Angeles County with an average daily traffic volume of approximately 100,000 vehicles per day. As CO impacts at the Wilshire Boulevard and Veteran Avenue intersection did not exceed the 8-hour CAAQS, it can be inferred that the intersections near the Project Site, which generate far fewer vehicles per day, would not create any CO hotspots. Furthermore, as previously discussed, the site is located in SRA 2, Northwest Coastal Los Angeles County. The monitoring station closest to the Project Site is the VA Hospital,, West Los Angeles air quality monitoring station located approximately 5.9 miles north of

29 U.S. Environmental Protection Agency. 2018. *Carbon Monoxide Emissions*.

30 SCAQMD. *2003 Air Quality Management Plan*. Available online at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/2003-aqmp.

the site. According to data obtained from the U.S. EPA's AirData database for CO pollutants, the highest eight-hour concentration reported for the VA Hospital, West Los Angeles station in 2019 was 1.2 ppm.[31] As such, the background CO concentration in combination with the CO concentration at worst-case scenario intersection in SCAB do not exceed 9.0 ppm and a CO hotspot would not occur. Therefore, the Proposed Project's CO hotspot impacts would not expose sensitive receptors to substantial air pollutant concentrations. Impacts would be less than significant.

Diesel Particulate Matter

Project Construction

Construction would result in the generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for grading and excavation, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodology for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). Therefore, short-term construction activities would not generate a significant health risk.

Additionally, the Project Site is approximately 3.5-acres. Generally, construction for projects contained in a site of less than 5 acres result in less than significant health risk impacts due: (1) to limitations of the off-road diesel equipment able to operate, which produces a reduced amount of generated DPM; (2) reduced amount of dust-generating ground-disturbance possible compared to larger construction sites, and (3) reduced duration of construction activities compared to the development of larger sites.[32] Furthermore, construction would be subject to and would comply with California regulations, such as CARB's In-Use Off-Road Diesel Rule which limits the idling of heavy-duty construction equipment to no more than 5 minutes, which would further reduce

31 U.S. Environmental Protection Agency. 2018. Monitor Values Report. Available: https://www.epa.gov /outdoor-air-quality-data/monitor-values-report.

32 This statement is based on findings from air quality studies prepared throughout Los Angeles and California.

nearby sensitive receptors' exposure to temporary and variable DPM emissions.[33] For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

Project Operation

The greatest potential during long-term operations for exposure to TACs is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel. Once operational, the majority of vehicle trips to the Project Site would be from residents and employees and, as a result, the Proposed Project would attract very few diesel truck trips. The Proposed Project includes a small coffee shop/ restaurant which would get deliveries by truck, as would some of the commercial uses. However, most of these trucks would be small delivery trucks (i.e., UPS, Amazon). Further, many smaller delivery trucks are electric or natural gas powered.[34] Additionally, the Project does not propose any stationary generators on--site. For these reasons, once operational, the Proposed Project would not expose nearby sensitive receptors to substantial amounts of air toxics and the project would have a less than significant impact.

The West Adams – Baldwin Hills – Leimert Community Plan EIR includes Mitigation Measure AQ-2 which requires new development within 500 feet of the Santa Monica Freeway to prepare a Health Risk Assessment that demonstrates the risk posed to new sensitive receptors.[35] As the Project Site is more than 500 feet (approximately 3,960 feet) from the Santa Monica Freeway and, as a result, is not required to adhere to this mitigation.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

33 California Air Resources Board. 2015. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel-Fueled (Off-Road Regulation)*. Available online at: https://ww3.arb.ca.gov/msprog/ordiesel/faq/idlepolicyfaq.pdf.

34 https://www.reuters.com/article/us-amazon-engines-natural-gas-exclusive/exclusive-amazon-orders-hundreds-of-trucks-that-run-on-natural-gas-idUSKBN2A52ML and https://www.reuters.com/article/us-ups-environment-natural-gas/ups-hits-the-gas-on-greener-delivery-truck-fleet-idUSKBN1WO1LX

35 City of Los Angeles. 2012. *West Adams – Baldwin Hills – Leimert New Community Plan Draft EIR*. Available online at: https://planning.lacity.org/eir/westadams/deir/index.html.

Less than Significant Impact. The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. Once operational, the Proposed Project will provide both residential and commercial uses. The Proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

Construction activities associated with the Proposed Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon Proposed Project completion. In addition, the Proposed Project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The Proposed Project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and not substantial. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

4. Biological Resources

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 Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project is in a developed urban area. The majority of the West Adams Community Plan Area is fully urbanized, containing primarily residential, commercial, and industrial development. The Project Site is fully developed with a self-storage facility and surface parking. As shown in **Figure II-2, Aerial View of the Project Site**, the Project Site is in a highly urbanized location surrounded by parcels that have long been fully developed with commercial, residential, industrial, and office uses. Immediately north of

the Project Site is a Metro right-of-way for the E (Expo) Line tracks and bicycle path. The Metro property runs along Jefferson Boulevard for the length of the Project Site and the La Cienega / Jefferson Metro Station is located abutting the Project Site's northeast corner. Across Jefferson Boulevard to the north, (also under construction) is the "Cumulus Project" that will have a 320-foot-tall high-rise building and a 110-foot-tall podium building with multifamily residential, commercial, and retail uses (with 1,200+ units). To the east of the Project Site across South La Cienega Boulevard is a five-level parking structure serving as parking for Metro patrons. South of the Project Site along South La Cienega Boulevard is a single-story Sees' Candies factory. To the west of the Property is a 16-story office building (currently under construction) known as the "(W)rapper."

Two non-native, non-protected trees are located on the Project Site. No street trees are in the right of way. The existing trees on site are in planters and due to their size, which is less than 8" diameter, and condition, the trees are not likely to support habitat such as nesting birds. Buildings on the site are occupied and in use by the current self-storage facility and therefore do not support species habitat. As such, the Project Site, and the surrounding area, is fully developed, development of the Proposed Project would not result in the removal or interference with any habitat. Therefore, the Proposed Project would not result in a substantial adverse effect, either directly or through habitat modification, on any candidate, sensitive, or special status species. No impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. Ballona Creek, located approximately 700 feet west of the Project Site, is the only significant water course in the vicinity. Ballona Creek is a concrete-lined channel surrounded by urban uses. Further, according to the California Department of Fish and Wildlife's CNDDB data, no riparian or other sensitive natural community are located on or adjacent to the Project Site.[36] The Project Site is also not located within a significant

36 CDFW, CNDDB, "Maps and Data", https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

ecological area as determined by the City or County of Los Angeles.[37] Furthermore, the West Adams – Baldwin Hills – Leimert Community Plan does not show the Project Site as being within a Conservation/Preservation Area.[38] Implementation of the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is located in a developed urban area with no naturally occurring wetland habitat. The Project Site has long been fully paved and developed with self-storage buildings and surface parking. The Project Site does not include any discernable drainage courses, inundated areas, wetland vegetation, or hydric soils, and thus does not include USACE jurisdictional drainages or wetlands.[39] Therefore, the Proposed Project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act. No impact would occur.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project is located in a dense, developed urban area. The Project Site has long been fully paved and developed with self-storage buildings and

37 City of Los Angeles General Plan, "Conservation Element" (2001), "Exhibit B2: SEAs [Significant Ecological Areas] and Other Resources," January 2001.

38 City of Los Angeles Planning Department. 2016. West Adams – Baldwin Hills – Leimert Community Plan. Available at: https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf, accessed August 20, 2021.

39 U.S. Fish and Wildlife Service. National Wetlands Inventory. Available at: https://www.fws.gov/wetlands/data/mapper.html, accessed September 23, 2021.

surface parking. The only vegetation within the Project Site consists of two non-native, non-protected ornamental trees that are typical of urban landscaping with diameters less than 8 inches. Accordingly, the Project will not involve the dispersal of wildlife nor would the Project result in a barrier to migration or movement. The Project includes the removal of two non-native trees. Based on the condition of the trees, they are unlikely to provide suitable nesting habitat for birds.[40] However, the Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The West Adams – Baldwin Hills – Leimert Community Plan EIR provides Mitigation Measure BR1that ensures compliance with the MBTA.[41] See **Table III-3, West Adams – Baldwin Hills – Leimert Community Plan EIR Applicable Mitigation Measures.** The Proposed Project would include this mitigation measure as a condition of approval to ensure compliance with the MBTA. As such, the Proposed Project would comply with all applicable regulations of the MBTA. Therefore, impacts to wildlife movement would be less than significant.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. Five tree species are included in the City's Protected Tree Ordinance: Coast Live Oak (Quercus agrifolia), Valley Oak (Quercus lobata), Western Sycamore (Platanus racemosa), California Black Walnut (Juglans californica), and California Bay (Umbellularia californica).[42] The arborist site evaluation, completed by RELM Studio, confirmed none of the two remaining trees on the Project Site are protected species (see Appendix D). The two existing trees are both Pine species with a trunk diameter of less than 8 inches. This species is neither native to California nor protected.[43] The two trees would be replaced in accordance with the existing tree replacement

40 Relm, Evaluation of Existing Trees, 3401 La Cienega Boulevard, Los Angeles, 2021, Appendix D.

41 City of Los Angeles Planning Department. West Adams-Baldwin Hills-Leimert New Community Plan EIR. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html, accessed August 20, 2021.

42 Los Angeles Municipal Code. Section 46.01. Available at: https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-132254, accessed August 20, 2021.

43 Scott D Baker, Evaluation of Exiting Trees3401 South La Cienega Boulevard Los Angeles, 90016, May 13, 2021

requirements of the City's Division of Urban Forestry, and the Project will result in a net increase of 80 trees at the Project Site. Therefore, the Project does not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and in this regard will have a less than significant impact.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is not located in any local, regional, or State mapped conservation area nor is it part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[44] Therefore, no impact would occur.

5. Cultural Resources

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

A Historic Resource Assessment Report (HRAR), dated March 2021, was prepared by ASM Affiliates (ASM) and is included in Appendix G of this SCEA.

Less than Significant Impact. Section 15064.5(b) of the *CEQA Guidelines* states that a project would have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the *CEQA Guidelines* defines a historic resource as: 1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (California Register); 2) included in a local register of historical resources; or 3) identified as significant in an

44 City of Los Angeles Significant Ecological and Coastal Resource Areas Policy Map, and CDFW, "NCCP Plan Summaries," accessed February 2021, https://www.wildlife.ca.gov/conservation/planning/nccp/plans.

historical resources survey. Any object, building, structure, site, area, place, record, or manuscript may be historically significant if the resource meets the criteria for listing on the California Register.[45] The California Register automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (NRHP).

National Register of Historic Places (NRHP)

To be eligible for listing in the NRHP, a property must be at least 50 years of age (unless it is of "exceptional importance") and be significant in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

A. Associated with events that have made a significant contribution to American history;

B. Associated with the historically significant persons;

C. Embody distinctive characteristics of a type, period, or method of construction/work of a master; possess high artistic values, or represent a significant and distinguishable entity; or

D. Yield information important in prehistory or history.

To be eligible for listing in the NRHP, a property must possess significance and retain sufficient integrity to convey that significance. The NRHP publication *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin 15, establishes how to evaluate the integrity of a property: "Integrity is the ability of a property to convey its significance" (National Park Service, NRHP 1998). The evaluation of integrity must be grounded in an understanding of a property's physical features and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, aspects of integrity:

1. Location is the place where the historic property was constructed or the place where the historic event occurred.

2. Design is the combination of elements that create the form, plan, space, structure, and style of a property.

45 *CEQA Guidelines* Section, 15064.5(a)(3).

3. Setting is the physical environment of a historic property and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.

4. Materials are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.

5. Workmanship is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory and can be applied to the property as a whole, or to individual components.

6. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property's historic character.

7. Association is the direct link between the important historic event or person and a historic property.

California Register of Historical Resources

To be eligible for listing in the State Historical Resources Commission's California Register, a property generally must be at least 50 years of age and be significant at the local, state, or national level under one or more of the following four criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or the cultural heritage of California or the United States;

2. Associated with the lives of persons important to local, California, or national history;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master, or possesses high artistic values; or

4. Yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

City of Los Angeles Historic-Cultural Monuments (HCM)

According to the City of Los Angeles Cultural Heritage Ordinance Chapter 9, Division 22 (Cultural Heritage Ordinance) of the Los Angeles Administrative Code, HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature. Any site (including significant trees or other plant life located on a site), building or structure of historic or cultural significance to the City of Los Angeles, can be designated as long as it is a historic structure or site:

1. in which the broad cultural, economic, or social history of the nation, State, or community is reflected or exemplified; or

2. that is identified with historic personages or with important events in the main currents of national, State, or local history; or

3. that embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style, or method of construction; or

4. that is a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A proposed resource may be eligible for local designation as a HCM if it meets at least one of the criteria above.

Los Angeles Historic Preservation Overlay Zone

According to Section 12.20.3 of the Los Angeles Municipal Code a Historic Preservation Overlay Zone **(**HPOZ) is an area of the City of Los Angeles which is designated as containing structures, landscaping, natural features or sites having historic, architectural, cultural, or aesthetic significance. To receive such designation, areas must be adopted as an HPOZ by the City Planning Commission and the City Council through a zone change procedure that includes notification of all affected and nearby property owners and public hearings (ordinance enacted in 1979). HPOZ areas range in size from neighborhoods of approximately 50 parcels to more than 3,000 properties. While most districts are primarily residential, many have a mix of single-family and multi-family housing, and some include commercial and industrial properties. HPOZs are established and administered by the Los Angeles City Planning Department (in concert with the City Council). Individual buildings in an HPOZ need not be of landmark quality on their own: it is the collection of a cohesive, unique, and intact collection of historic resources that qualifies a neighborhood for HPOZ status. The HCM designation is intended only for individual sites, structures or buildings that meet the HCM criteria. As there are no defined

criteria for an HPOZ, the criteria for City of Los Angeles HCMs apply (see preceding section).

City of Los Angeles Eligibility Criteria

Districts, sites, buildings, structures, and objects are assigned historical significance based on their exceptional value or quality illustrating or interpreting the heritage of Los Angeles, California, or the United States in history, architecture, archaeology, engineering, and culture. A number of criteria are used in demonstrating resource importance. Specifically, criteria outlined in the NRHP, California Register and HCM are similar and provide the guidance for making such a determination. The California Office of Historic Preservation (OHP) and the City's Office of Historic Resources (OHR) guidelines recommend that resources at least 45 years old be evaluated for historical significance to ensure consideration of resources that may turn 50 prior to the beginning of a project (five-year buffer).

SurveyLA Contexts and Themes

SurveyLA is a multi-year, citywide project during which more than 800,000 parcels in the City of Los Angeles have been surveyed. As part of this project, the Office of Historic Resources developed a citywide historic context statement that includes a set of contexts and themes for the consistent evaluation of properties. A specific context was developed that provides detailed background and guidelines for the evaluation of industrial properties (City of Los Angeles 2011:118-125).

- Context: Industrial Development, 1850–1980
- Sub-Context: Manufacturing for the Masses, 1887–1980
- Theme: Factories, 1887–1980
- Summary Statement of Significance: Resources evaluated under this theme may be significant in the area of Industry. Some may also be significant in the area of Architecture. This property type is intended to relate to factories that were not part of one of the major industries addressed in the context but were nonetheless important to the economy of Los Angeles.

Property Type #1: Industrial – Manufacturing – Factory

- Property Type Description: In this context, the term "factory" refers to an industrial building or small group of industrial buildings organized around a manufacturing

process. This property type can include a single workshop, a large plant, or a complex of related buildings.

- Property Type Significance: In general, intact factory buildings from the first half of the twentieth century represent a brief but dramatic transition of Los Angeles from an agricultural town into a top-ranking industrial powerhouse. Factories that are associated with well-known and/or demonstrably influential manufacturing companies from the era significantly represent the importance of manufacturing in the industrial, economic, and social history of Los Angeles.

- Geographic Location: Citywide. Generally, have industrial zoning and located along historic rail alignments.

- Area(s) of Significance: Industry; Architecture

- Criteria: NRHP: A/C; CRHR: 1/3; Local: 1/3

- Period of Significance: 1887–1980

- Known "Manufacturing for the Masses" Resources in the City of Los Angeles: Two known resources under this theme are located in the vicinity of 3401 S. La Cienega Boulevard and constructed in the same year.

Resource Name	Location	Comments
Sterling Casket Company; Peerless Garment	3626 W. Jefferson Boulevard; 3410 S. Victoria Ave.	Constructed 1946. Used by Sterling Casket Co., until 1960. May not meet integrity thresholds for the NRHP.
See's Candies	3425 S. La Cienega Boulevard	Candy factory and local industrial headquarters of See's Candies. In continuous operation here since 1946.

Property Type #2: Industrial Manufacturing – District

- Property Type Description: A distinct concentration of industrial buildings that, as a whole, represents an important pattern of industrial development in Los Angeles may be eligible as a historic district under this theme. Industrialists in the twentieth century planned industrial tracts within City-prescribed zoning and invested in infrastructure like spur tracks, roads, water, and power to attract manufacturers to lots. Once established, the tract or district produced a variety of goods for both export and the local/regional market.

- Property Type Significance: Historic manufacturing districts may be significant in the area of Industry if they exemplify the industrial landscape of Los Angeles during

its rise as a manufacturing powerhouse in the early and mid-twentieth century. Many contributors exemplify the key elements of industrial design from the period of significance, including daylighting (or controlled conditions) and are good to excellent examples of architectural styles of the day.

- Geographic Location: Citywide. Generally, have industrial zoning and located along historic rail alignments.
- Area(s) of Significance: Industry; Architecture
- Criteria: NRHP: A/C; CRHR: 1/3; Local: 1/3
- Period of Significance: 1887–1980

History of the Project Area and Site

The Project falls within the West Adams-Baldwin Hills-Leimert Community Plan Area of the City of Los Angeles; the following area history is drawn in part from the West Adams Community Plan and EIR. The Project Site is located within the original land grant of the Pueblo of Los Angeles, which was established as a civilian settlement at the behest of the Spanish royal governor of California on September 4, 1781. Mexico rebelled against Spain in 1810, and by 1821 Mexico, including California, achieved independence. The Mexican Republic began to grant private land to citizens to encourage immigration to California. Huge land grant ranchos took up large sections of land in California. It was during this period that four land grants were made which included the area now designated as the West Adams-Baldwin Hills-Leimert CPA: Rancho Rincon de Los Bueyes, Rancho Las Cienegas, Rancho La Ballona, and Rancho Cienega O'Paso de la Tijera.

The Secularization Act was passed in 1833, giving the vast mission lands to the Mexican governor and downgrading the missions' status to that of parish churches. The Governor of California then redistributed the former mission lands, in the form of grants, to private owners. By 1841 the population of Los Angeles was 141. In 1842, the first discovery of gold in California was made at Placerita Canyon near Mission San Fernando resulting in Los Angeles' first population boom. California attained statehood and the City of Los Angeles was incorporated in 1850.

However, it was not until the Southern California real estate boom of the 1880s that many of the ranchos were subdivided and sold. One of these subdivisions was Rancho Cienega O'Paso de la Tijera, acquired by E. J. "Lucky J" Baldwin in 1875. Baldwin maintained the land for agriculture and cattle grazing use up until his death (shortly after which oil was

discovered on the land). Later subdivisions of this large holding created the Leimert Park and the Baldwin Hills Estates communities.

The following information related to the period of significance for the Project Site is excerpted from the 3401 South La Cienega HRAR:

In the mid-1940s, industrial development on the west side of the County was booming. The same year that the first buildings on the Project Site and several other industrial properties nearby were constructed (1946), developer Samuel Hayden, a transplanted glass manufacturer from the east, and architect S. Charles Lee established the Hayden Tract, in Culver City across Ballona Creek from the project area. The area specifically tagged for industrial use was actively promoted by the Chamber of Commerce. Hayden filed the Hayden Tract map on March 14, 1946.

Harry Culver's dream for a balanced community included an economic base to support its residents. Main Street provided the initial retail properties, and the studios were the earliest industry. By 1922, the first manufacturing plant, Western Stove, was established on Hays Street (now National Boulevard), north of Ballona Creek, along the Pacific Electric right of way. The early 1930s saw the addition of Helms Bakeries, which delivered door to door. To survive, Western Stove produced parts for the war effort.

By 1949, the 40-acre Hayden Tract was a more than 60-acre subdivision of "modern reinforced concrete buildings," according to the *Hollywood Citizen News,* which proclaimed it as "one of the finest in the world." It was designed to expand Culver City's economic base. Business owners gave easements on their properties to the railroad for spur tracks, which enhanced the manufacturers' freight car access to the Pacific Electric Railway.

Late Twentieth Century Decline in Los Angeles Industry

Los Angeles industry began a gradual decline in the late 1960s, due in part to the rising price of fuel and land, dispersal of manufacturers beyond city limits, and a trade deficit that reflected ever greater reliance on foreign imports in the consumer market. Oil discoveries in the Los Angeles Basin dwindled in the 1960s and 1970s, and production declines in oil and natural gas led utilities in the area to import more of the fuel to feed the energy-hungry metropolitan area. In 1973, a fuel shock resulting from an oil embargo by the Organization of Petroleum Exporting Countries (OPEC) caused intense inflation and helped to send the national economy into recession.

The completion of the interstate highway system in the 1960s and 1970s contributed to the rise of truck transport, which further decentralized industry in the city. Manufacturers

no longer needed to be near established rail lines, opening up cheaper land beyond city limits for industrial development. Many manufacturers moved their plants eastward, following Interstate 10 (I-10) to settle in communities in the San Gabriel Valley and western San Bernardino County. The buildings they left behind in Los Angeles often shifted to warehouse use within a growing network of importing and distribution businesses.

Universal Match Company

After World War II, cigarette smoking became an icon of the good life as conceived by the American consumer culture, due in large part to aggressive marketing on the part of tobacco manufacturers (Brandt 2007:97). Free matchbooks emblazoned with advertising gave smokers what was needed to make cigarettes ubiquitous (Brandt 2007:30). A number of matchbook manufacturers thrived, among them the Universal Match Company (Co.), which started production in 1925 and operated several plants throughout the United States. Production at the Los Angeles plant appears to have been modeled on the main plant in St. Louis, Missouri, which had a machine to cut large rolls of heavy paper into sheets during the process of producing matchbooks. It also had printing capabilities, including a letterpress machine (Hopkins-Benton 2013:15). The matchbooks printed in each of the Universal Match Co. facilities began in the design department in St. Louis, where the printing plates were also made. Plates were shipped daily to the plants, where the printing and compositing of the matchbooks took place (Hopkins-Benton 2013:16).

Despite their success, the matchbook business was not without challenges. In 1947, executives from various companies stood before the House Ways and Means Committee to air their displeasure with federal taxation. F. J. Prince, the representative of Universal Match Co. said he “bristled when he sees a mechanical cigarette lighter.” He facetiously claimed that if the tax on matchbooks was not slashed, cigar stores would have to stop giving them away. “Matches are the only thing that Americans still get for free,” he said … “After all, a match is no different from the pilot on a stove. It provides a light. So why tax it? Wouldn’t be surprised if the lawmakers taxed pilot lights” (Othman 1947).

Individual Assessment

Light industrial properties originally constructed in the 1940s, approximately the same time as the oldest buildings on the Project Site, are located immediately to the south and west, and along the south side of West Jefferson Boulevard across South La Cienega Boulevard. A larger industrial area includes the Hayden Tract in Culver City across Ballona Creek to the west, along with concentrations of industrial areas between the creek and the Inglewood Oil Fields to the southeast. Separate extensive residential

developments are adjacent to the industrial areas, consisting of two-story apartment buildings and single-story houses with detached garages constructed in the 1940s and 1950s. The parcel contains nine buildings, comprising 1,144 storage units. All of them are painted in the Public Storage corporate colors of cream walls with bright orange doors and accents. The parcel is completely paved. Two of the buildings, including the largest, were constructed in 1946; the other seven are typical single-story self-storage buildings constructed in 1977.

A HRAR, dated March 2021, was prepared by ASM Affiliates (ASM) in anticipation of the Proposed Project, which includes demolition of the existing self-storage facility and construction of new residential and commercial buildings.[46]

The Project Site is not listed in the California Register, it is not a California Historical Point of Interest (CPHI), and it is not a California State Historic Landmark (CSHL). It has not been identified as a City of Los Angeles HCM, and it is not located in an HPOZ. Furthermore, it is not listed in the NRHP. The Project Site has not previously been recorded by SurveyLA. ASM carefully considered whether the industrial buildings are individually eligible under NRHP/California Register/ HCM Criteria A/1/1, B/2/2, C/3/3, or D/4/4, as defined in the Eligibility Criteria, and/or old enough to warrant evaluation. To do so, ASM evaluated the buildings within the appropriate historic contexts established by SurveyLA.

Two of the buildings (referred to as A and L in the HRAR) on the Project Site were constructed in 1946 as the initial development of the parcel. The remaining buildings were added later and do not meet the 45-year age requirement, thus only two of the buildings were evaluated as potentially historically significant properties.

Building A is the largest on the site. It is a two-story utilitarian brick building with a rectangular plan and a flat parapet obscuring a system of rounded bowstring-truss roofs with skylights. Fenestration is irregular. Windows are multi-light steel with operable hopper-type sections; sizes range from eight-by-five lights to four-by-three lights. Windows are slightly recessed and have no surrounds. At the south (primary) façade, several windows have been painted over, and portions are replaced with fixed panes. There are five flat metal single doors at the south façade, approached by concrete ramps or steps that run parallel to the side of the building. One of the doors is inset into a slightly recessed stucco section approximately the size of a vehicle entry.

46 Phase 1 Historic Resources Assessment Report for 3401 S. La Cienega Boulevard, ASM Affiliates Inc., March 2021.

Building L is a single-story flat-roofed brick building constructed at the same time as Building A. A row of bricks laid vertically outlines the flat parapet. At each façade, the brickwork shows some detail in rows of bricks laid endwise to form a kind of stringcourse above and below the windows. At the southeast corner, a set of concrete steps with a steel railing provides access to a glazed door with sidelights. A brick planter is located to the west of the door. Above the door is an awning composed of synthetic material designed to look like shingles. There are two windows at the south façade, one of which has the same type of awning as the door. The windows have security bars. The west façade has two four-by-five-light windows similar in size toward the north end of the façade. A flat door is sheltered by a small, flat cantilevered canopy. Three more windows toward the south end of the façade are non-original replacements inserted into the original openings; these three windows have security bars. The north façade has three identical three-by-five-light steel windows, each with a one-by-two-light operable awning-type central section.

The single-story 1977 storage buildings are arranged within the parcel to maximize the utilitarian function of the Project Site. Buildings G, H, J, and K are positioned parallel to each other toward the west side of the Project Site, with a relatively narrow access lane between them. Buildings D and E face one another toward the east side of the property. With the exception of Building F, all of these buildings have two similar façades, with the storage units arranged back-to-back and access doors aligned along the façades. They all have flat or nearly flat roofs with a shallow metal fascia and sit on poured-concrete foundations. Walls are constructed of concrete masonry units. Except for a few utility doors, the evenly spaced doors are recessed corrugated metal roll-up style, wide enough to accommodate a single vehicle. The wall space between the roll-up doors is minimal.

Criteria A/1/1

To evaluate Building A and Building L under Criteria A/1/1, ASM carefully considered whether they are associated with events that have made a significant contribution to the broad patterns of our history. ASM evaluated the building under the SurveyLA Context: Industrial Development, 1850–1980, Sub-Context: Manufacturing for the Masses, 1887–1980, Theme: Factories, 1887–1980, Property Type #1: Industrial – Manufacturing – Factory, as described in the preceding section.

The buildings meet some of the registration requirements of the themes. The buildings were constructed during the period of significance of the theme (1887-1980), and their original use was in the area of industry and manufacturing. In this way they are associated with an era when Los Angeles underwent a dramatic transition from an agricultural town into a major industrial hub. They are, and were, located in an area zoned for industry,

established at a time when such designations were occurring throughout Los Angeles. Typical of factories from that era, they were located adjacent to a rail line.

However, the buildings do not meet enough of the registration requirements of the themes. The property was a factory for Universal Match Co. whose products are associated with twentieth-century social history. However, Universal Match Co. was not a company that had a ***significant impact*** on twentieth-century social history. Universal Match Co. simply provided a product with widespread use. Universal Match was a manufacturing enterprise, but it was not a household name and was not a demonstrably influential manufacturing company. As such, it does not meet the registration requirement that the manufacturing company must have had a significant impact. The company was not closely associated with the early manufacture of ***new technologies*** in the late nineteenth and early twentieth centuries (matches were not a new technology) and research did not reveal that the company has any significant ***ethnic/cultural associations***.

SurveyLA, as well as NRHP[47] and California Register guidelines, recommend comparing similar resources in making a recommendation of eligibility. SurveyLA identified known eligible resources that are similar to Buildings A and L and that meet the registration requirements and possess the character defining features and local, state, and/or national criteria. Buildings A and L appear to retain only some of the essential physical features from the period of significance, and they can be described as two related utilitarian buildings. However, the buildings do not possess branding or company logos on the exterior, they do not retain distinctive equipment or building elements that reflect a particular kind of manufacturing process, and they do not have programmatic elements on the façade that denote what was manufactured at the plant. In comparison to other eligible resources, Buildings A and L are not good representations of the themes under Criterion A/1. There are many better examples of the theme throughout the City of Los Angeles, including the Sterling Casket Company at 3626 West Jefferson Boulevard and See's Candies, which is a significant national company in continuous operation since its founding in Los Angeles. (For more examples, see City of Los Angeles 2011, *SurveyLA Los Angeles Citywide Historic Context Statement: Industrial Development, 1850-1980*;

47 According to the NPS, Bulletin No. 15, "Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if: 1) It is the sole example of a property type that is important in illustrating the historic context or 2) It clearly possesses the defined characteristics required to strongly represent the context. If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility" (NPS 1998: Part V).

and City of Los Angeles 2015,[48] *SurveyLA Supplemental Historic Resources Survey Report: Industrial Properties in the West Adams – Baldwin Hills – Community Plan Area.*[49])

As such, Building A and Building L are recommended not individually eligible under NRHP/California Register/HCM Criteria A/1/1 for Manufacturing for the Masses.

Criteria B/2/2

To evaluate the buildings under Criteria B/2/2, ASM carefully considered whether they are associated with persons significant in our past. No important persons were found associated with the Project Site. Furthermore, SurveyLA does not include Criteria B/2/2 among the applicable criteria under these Industrial themes. As such, Building A and Building L are recommended not individually eligible under NRHP/California Register/HCM Criteria B/2/2.

Criteria C/3/3

To evaluate the buildings under Criteria C/3/3, ASM carefully considered whether they embody distinctive characteristics of a type, period, or method of construction, whether they represent the work of a master, and whether they possess high artistic values. Applying the SurveyLA eligibility standards for this context, the property is recommended not eligible under NRHP/CRHR/HCM Criteria C/3/3 because it is not exemplary of the character-defining features of the industrial style, as defined for factories in the SurveyLA industrial context.

Although constructed during the period of significance, it is unknown whether Buildings A and L retain most of the essential physical features from their year of construction as there is not sufficient documentary evidence to support such a conclusion. In fact, both buildings do appear to have experienced alterations over time from visual observations made during a survey. They do not possess any signs of branding or company logos on the building exterior, they do not possess distinctive equipment or building elements that reflect a particular kind of manufacturing process, they do not have programmatic elements on the façade that denote what was manufactured at the plant, and they were not designed in prevalent architectural styles of the period.

48 SurveyLA. Los Angeles Historic Resources Survey. Available at: https://planning.lacity.org/odocument/ad40500b-cf5a-436e-8c80-a81606544c01/IndustrialDevelopment_1850-1980.pdf, accessed August 20, 2021.

49 SurveyLA. Industrial Zone Properties in the West Adams – Baldwin Hills – Leimert Community Plan Area. Available at: https://planning.lacity.org/odocument/70187c01-923b-44b6-a6d9-b5e1b915c4ce/SurveyLAWestAdamsBaldwinHillsLeimert_IndustrialReport_0.pdf, accessed August 20, 2021.

Although constructed during the period of significance as a manufacturing plant, they are common utilitarian buildings that do not embody the distinctive characteristics of the style, period, region, or method of construction as well as other local examples, nor are they associated with a significant architect or builder. In comparison to other buildings associated with these themes, there are numerous better representatives throughout Los Angeles, all of which display architectural styles or innovations in engineering more distinctive than the utilitarian style of the buildings on the Project Site. A few of these are the Columbia Mills facility at 2630 Lacy Street, which is a daylight factory; the Mid-Century-Moderne Merle Norman Cosmetics factory at 9100 S. Bellanca Avenue; and a rare example of a Quonset hut at 3410 S. Farmedale Avenue (for more examples, see City of Los Angeles 2011, *SurveyLA Los Angeles Citywide Historic Context Statement: Industrial Development, 1850-1980,*[50] and City of Los Angeles 2015, *SurveyLA Supplemental Historic Resources Survey Report: Industrial Properties in the West Adams – Baldwin Hills – Community Plan Area*[51]). As such, Building A and Building L are recommended not individually eligible under NRHP/California Register/HCM Criteria C/3/3.

Criteria D/4/4

The buildings are a common property type that do not have the potential to provide information about history or prehistory that is not available through historic research. As such, Buildings A and L are recommended not individually eligible under NRHP/California Register/HCM Criteria D/4/4.

Integrity

Buildings A and L have not been found to meet any of the criteria for eligibility. Therefore, an assessment of historic integrity is not necessary, as there is no historical association, period, or area of significance.

Buildings D, E, F, G, H, J, and K

Following California OHP guidelines for historic resource surveys, Buildings D, E, F, G, H, J, and K do not meet the age requirement of 45 years to be considered for eligibility.

50 SurveyLA. Los Angeles Historic Resources Survey. Available at: https://planning.lacity.org/odocument/ad40500b-cf5a-436e-8c80-a81606544c01/IndustrialDevelopment_1850-1980.pdf, accessed August 20, 2021

51 SurveyLA. Industrial Zone Properties in the West Adams – Baldwin Hills – Leimert Community Plan Area. Available at: https://planning.lacity.org/odocument/70187c01-923b-44b6-a6d9-b5e1b915c4ce/SurveyLAWestAdamsBaldwinHillsLeimert_IndustrialReport_0.pdf, accessed August 20, 2021.

Historic District Eligibility

ASM carefully considered whether the buildings within the Project Site are potentially eligible as contributors to a historic district. The property is not located within or near any currently designated historic districts. There are two known historic resources of a similar age within 0.25 mile of the Project Site. Those two resources are the adjacent See's Candies facility, constructed in 1946 at 3425 South La Cienega Boulevard, and an industrial warehouse at 5500 West Jefferson Boulevard, constructed in 1949. See's Candies is a self-contained food-processing plant, and the property on West Jefferson is noted for its Late Modern design by a known architect; neither of these properties have areas of significance in common with the Project Site to the extent that the three properties could be considered as a discontiguous historic district. In addition, the elevated Expo Metro E Line and the La Cienega/Jefferson Metro Station immediately north and the recent demolition and replacement of many properties in the vicinity with high-rise multiple-use properties have changed the area in response to the City's drive to create a transit hub. As a result, there is a lack of coherence in what might previously have been a good representation of the rapid development of industrial uses at South La Cienega Boulevard and W. Jefferson Boulevard. For a district to be eligible it must be coherent, meaning it "possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS 1998:5).

In consideration of whether the buildings on the Project Site could be eligible as a historic district in itself, only two of the nine buildings are more than 45 years old; the remaining seven are not of such exceptional historic significance to warrant consideration. Regarding eligibility requirements for a historic district under the theme of Manufacturing for the Masses, the property was constructed during the period of significance as a manufacturing plant, but it does not meet any of the other eligibility standards for the theme. Regarding character-defining features, there are two associated utilitarian buildings, but the property does not display the other character-defining features listed for a historic district under this theme. Of the essential aspects of integrity, it retains only integrity of Location. Therefore, the Project Site is not recommended eligible as a contributor to any historic district or potential historic district under the recommended evaluation NRHP/California Register/HCM Criteria A/1/1 and C/3/3, or under any other criteria.

Therefore, the Proposed Project involving demolition of these buildings would have a less than significant impact on historical resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less Than Significant Impact. Section 15064.5(c) of the *CEQA Guidelines* states if a lead agency determines an archaeological site is an historical resource as defined by the PRC, then the protection measures of CEQA shall apply. An Historic Resources Assessment Report (HRAR) was prepared in anticipation of the Proposed Project[52] (see Appendix G of this SCEA). The pedestrian survey conducted as part of the HRAR, did not identify any prehistoric or historic archaeological sites as there is no exposed ground surface on the Project Site. Several prehistoric sites had been documented in proximity to the Project Site. A search result for the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was received on January 8, 2021. The result was positive and suggested that the Gabrieleno/Tongva San Gabriel Band of Mission Indians be contacted. The NAHC also provided a list of six additional tribal entities (Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino- Tongva Tribe, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseno Indians) who may also have knowledge of cultural resources in the Project area. A letter of inquiry was sent to the Gabrieleno/Tongva San Gabriel Band of Mission Indians on January 11, 2021, but no response has been received to date. Copies of the correspondence are provided in Appendix G of this SCEA.

While unlikely, it is possible that unknown archaeological resources or human remains could exist at the Project Site and could be encountered during excavation for the two proposed subterranean parking levels. Therefore, the Project would be subject to Mitigation Measures CR5 through CR10 of the West Adams Community Plan EIR as conditions of approval, which would minimize impacts in the event archaeological resources are encountered during construction. These conditions outline the process for accidental discovery of buried resources. See **Table III-3, West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures.** As a result, impacts related to archeological resources would be less than significant.

52 Phase 1 Historic Resources Assessment Report for 3401 S. La Cienega Boulevard, ASM Affiliates Inc., March 2021.

c. Would the project disturb any human remains, including those interred outside of formal ceremonies?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project Site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains and human remains are not expected to be encountered during construction of the Proposed Project. There are no known human remains on the site. If remains are encountered, State Health and Safety Code Section 7050.5 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. Compliance with these regulations, as well the West Adams Community Plan EIR Mitigation Measures CR5 through CR9, as outlined above, as Conditions of Approval, would ensure the Proposed Project would not disturb human remains. Impacts would be less than significant.

6. Energy

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

The following policies address energy efficiency:

U.S. Clean Power Plan

On October 23, 2015, the EPA issued the Clean Power Plan under Section 111(d) of the Clean Air Act. The Clean Power Plan is also known as the Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units rule. The goal of the Clean Power Plan is to reduce carbon dioxide (CO2) emissions from existing power plants 32% from 2005 levels by 2030, with incremental interim goals for years 2022 through 2029. The Clean Power Plan set a CO2 emission reduction target for each state and requires each state to develop a plan to achieve the target. At the same time EPA

issued the Carbon Pollution Standards for New, Modified and Reconstructed Power Plants rule under Section 111(b) of the Clean Air Act, to limit CO2 emissions from new, modified, or reconstructed electricity generating units by implementing Best System of Emissions Reduction (BSER) for each type of generating unit. California's Proposed Compliance Plan for the Federal Clean Power Plan was adopted by CARB on July 27, 2017.

Assembly Bill 32

As discussed in Section VIII: Greenhouse Gas Emissions, the State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill (AB) 32, which set the GHG emissions reduction goal for the State of California into law. As defined under AB 32, GHGs include CO2, CH4, nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). AB 32 requires CARB—the State agency charged with regulating Statewide air quality—to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020 by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA.

Senate Bill 2 (1X)

SB 2 (1X) was passed in April 2011 and became effective December 10, 2011, requires utilities to procure eligible renewable energy resources of 33% by 2020, including the following interim targets:

- Maintain at least an average of 20% renewables between 2011 and 2013.
- Achieve 25% renewables by 2016.
- Achieve 27% renewables by 2017.
- Achieve 29% renewables by 2018.
- Achieve 31% renewables by 2019.
- Achieve 33% renewables by 2020.

Senate Bill 350

SB 350, which was passed in September 2015 and became effective October 7, 2015, requires utilities to procure eligible renewable energy resources of 50% by 2030, including the following interim targets:

- Achieve 40% renewables by 2024.
- Achieve 45% renewables by 2027.
- Achieve 50% renewables by 2030 and maintain this level in all subsequent years.

SB 350 also requires a doubling of energy efficiency of buildings and conservation savings in electricity and natural gas end uses of retail energy by 2030. The law requires publicly owned utilities to establish annual targets for energy efficiency savings and demand reductions consistent with the Statewide goal. The Public Utilities Commission also must approve programs and investments by electrical corporations in transportation electrification, including electric vehicle charging infrastructure.

Petroleum Fuel

The Proposed Project would not create an increase in demand such that new energy sources or capacity enhancing alterations to existing facilities would be required. Energy saving and sustainable design would be incorporated throughout the Proposed Project. The Proposed Project would be designed to meet Cal Green and Title 24 Building Standards Code (CALGreen Code). The Proposed Project's infill location would promote the concentration of development in a developed location with extensive infrastructure. The Proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled for residents and employees.

In order to promote sustainability, the Proposed Project would be aligned to sustainable development targets including:

Americas Residential Partnership's Responsible Property Investment Strategy & Roadmap to Net Zero Carbon for the multifamily building which would incorporate:

- Net Zero Carbon from 2020 for Scope 1 & 2 in construction, and Scope 1, 2 & 3 in operation[53]

[53] GHG emissions are categorized into three groups or scopes. Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.53

- LEED Gold minimum
- Operational performance rating, such as FitWel

The Commercial Building is targeting:

- Net Zero Carbon from 2025 for Scope 1 & 2
- Absolute Zero by 2040 for Scopes 1, 2 & 3
- LEED Gold minimum
- Operational performance rating, such as FitWel

Strategies that support these targets and that are proposed for the Proposed Project (PDF 1) include:

- Designing for energy and water efficiency as a priority
- Both buildings will be entirely electric buildings (no natural gas in either building)
- ENERGY STAR Appliances
- LED lighting
- Intend to purchase 100% green power from the LADWP grid
- VAV HVAC system in the commercial building with MERV 15 filter + recycles outdoor air
- 100 EV parking spaces
- Exploring on-site PV & battery storage
- Bike showers, lockers, and storage
- Rain water collection cistern for stormwater management and reuse of water in landscaping on site
- Use of permeable paving where feasible
- Use of drought tolerant plants for landscaping

- Undertaking a Life Cycle Assessment of embodied carbon in materials to engage supply chain in achieving lower carbon material substitutions
- Target construction waste diversion
- Use of low carbon concrete and rebar construction materials where feasible

The building will be sustainably designed to meet and/or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high-performance building envelopment.

Construction of the Proposed Project would result in short-term consumption of petroleum-based fuels to power construction vehicles and equipment. During construction, energy would be consumed in the form of petroleum-based fuels (i.e., gasoline and diesel) used to power off-road construction vehicles and equipment on the Project Site, however, the Applicant has committed to using electric powered equipment where feasible. In addition, The Proposed Project will be required to implement Mitigation Measure AQ1 from the West Adams – Baldwin Hills – Leimert Community Plan EIR. Mitigation Measure AQ1 (See **Table III-3, West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures)** includes the following best management practices:

- Use properly tuned and maintained equipment.
- Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible.
- Use heavy duty diesel-fueled equipment that uses low NOX diesel fuel to the extent it is readily available and feasible.
- Use construction equipment that uses low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.

- Maintain construction equipment in good operating condition to minimize air pollutants.

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.

In addition to reducing emissions, these best management practices will also reduce petroleum use during construction. Construction worker travel to and from the Project Site would also use petroleum, as well as delivery truck trips (although many delivery trucks are natural gas or electric powered); and to operate generators to provide temporary power for lighting and electronic equipment.

This Project would be one of hundreds of projects occurring within the Los Angeles area during the next several years. There are no unusual features about project construction, such as size of the site, length of the construction schedule, size of the building, etc., that would cause this project to result in greater use of petroleum fuels than other similar projects. In fact, the Applicant has committed to several energy saving features that would reduce petroleum use (listed above). Therefore, Proposed Project construction would not be wasteful or inefficient regarding use of petroleum.

During operation, motor vehicle travel and building maintenance equipment would consume petroleum-based fuels. Fuel consumption of motor vehicles in California is regulated by the National Highway Traffic Safety Administration and EPA's Safer Affordable Fuel Efficiency (SAFE) Vehicles which sets standards regarding fuel efficiency. The Proposed Project is expected to draw a mix of residents with a variety of vehicle types that would likely be representative of the overall region. The inclusion of EV charging spaces, proximity to the transit station, transportation demand management (TDM) strategy, and inclusion of bike parking will encourage residents and employees to use fewer petroleum-based options. The Project Site is located adjacent to the La Cienega/Jefferson Metro station and existing bicycle path, which will encourage the use of transit and alternative modes of transportation to and from the Project Site and reduce vehicle miles traveled and associated fuel consumption.

To further reduce VMT and petroleum demand associated with the Proposed Project, the following TDM strategies are incorporated into the Proposed Project as Project Design Features:

- Education and Encouragement: Promotions and Marketing. This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. For the purposes of the analysis, it is assumed that every employee would be eligible for passive marketing and promotional materials.

- Bicycle Infrastructure: Include Bike Parking Per LAMC. This strategy involves the implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations. Projects providing short-term and long-term parking in accordance with LAMC Section 12.21A.16 qualify for this measure. The applicant has indicated that the Proposed Project will comply with the requirements of the Los Angeles Municipal Code.

- Bicycle Infrastructure: Include Secure Bike Parking and Showers. This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. Projects providing long-term bicycle parking secured from the general public in accordance with LAMC Section 12.21A.16(d)(2) and showers in accordance with LAMC Section 91.6307 qualify for this measure. The applicant has indicated that the proposed project will comply with the requirements of the Los Angeles Municipal Code.

- Neighborhood Enhancement: Pedestrian Network Improvements. This strategy involves implementation of pedestrian network improvements throughout and around the project site that encourage people to walk. This includes internally linking all uses within the project site with pedestrian facilities such as pathways and walkways and connecting the project site to the surrounding pedestrian network. It also includes the elimination of barriers such as walls, landscaping, and slopes that impede pedestrian circulation. The proposed project includes pedestrian infrastructure to connect facilities within the site and the surrounding street system.

Due to the many energy efficient features, best management practices, and TDMs, the Proposed Project will not result in wasteful or inefficient use of petroleum. Impacts would be less than significant.

Natural Gas

The Proposed Project will construct and operate entirely electric buildings and would not increase demand for natural gas. As such, there would be no increase in natural gas usage as a result of the Project.

Electricity

The Proposed Project will be powered entirely through electric power (no natural gas). To ensure the Proposed Project does not place additional demand on the Los Angeles Department of Water and Power (LADWP) power grid, the Proposed Project includes several sustainable features aimed at increasing energy efficiency. These include use of ENERGY star appliances and obtaining electricity from the LADWP's green power grid (see **PDF-1**). The Proposed Project also includes the planting of more than 80 trees to aid in lowering the overall temperature on the Project Site and the area, thereby reducing the overall need for electrical demand during peak times.

During construction of the Proposed Project, electricity would be consumed to supply and convey water for dust control and to power electric construction equipment as well as temporary lighting. Electricity use would not be wasteful or inefficient.

During operation, the Proposed Project is anticipated to consume a net increase of approximately 6.31 Mega Watt-hour per year (MWh/year) compared to existing uses on the Project Site, see **Table IV-10, Project Electricity Demand**.

Table IV-10
Project Electricity Demand

Land Use	Size	Electrical Demand (MWh/year)
Apartments Mid Rise	260 du	1.03
General Office Building	227,543 sf	3.18
Regional Shopping Center	2,869 sf	0.03
Parking	785 spaces	1.83
	Total	**6.81**

Source: **Appendix A,** Impact Sciences, 2021. See CalEEMod output files.
Notes: du = dwelling units; sf = square feet

LADWP maintains an electrical capacity of more than 8,009 MW with a peak capacity of 6,502 MW (reached on August 31, 2017)[54] The Proposed Project would represent a daily capacity of 0.01 MW which would be a minimal impact on the City's overall demand. With the addition of PDFs specifically aimed at reducing electrical demand (i.e., ENERGY star appliances, green power, and landscaping to cool the site), electrical demand would not be wasteful or inefficient.

Accordingly, with the incorporation of the above-referenced design features, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts would be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency.

54 About LADWP https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=1cmyz2x7t6_4&_afrLoop=113600433738952

The 2017 Power Strategic Long-Term Resource Plan (SLTRP)[55] document serves as a comprehensive 20-year roadmap that guides the LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The 2017 SLTRP expands its analysis on the 2016 Final Power Integrated Resource Plan (IRP) recommended case with updates in line with the latest regulatory framework, and updates to case scenario assumptions that include a 65% renewable portfolio standard by 2050.

Regulatory interpretations of primary regulations and State laws affecting the power system, including AB 32, SB 1368, SB 1, SB 2 (1X), SB 350, SB 32, US EPA Rule 316(b), and the US Clean Power Plan as described above, continue to evolve particularly with certification requirements of existing renewable projects and their applicability towards meeting in-state or out-of-state qualifications. The most recent SLTRP attempts to incorporate the latest interpretation of these major regulations and State laws.

The Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code and the L.A. Green Building Code. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 and the L.A. Green Building Code would reduce Project energy consumption. Additionally, as discussed above, electric service is available and would be provided. Moreover, LADWP plans to increase renewable energy sources to meet the City's goals for a clean energy future. Specifically, the goals include supplying 55% of power retail sales from renewable energy resources by 2025, 80% by 2036, and 100% by 2045, as well as achieve a carbon neutral power system by 2050.[56] As described above, the Proposed Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Gold level under the LEED green building program that would reduce energy and water usage. Specifically, the Proposed Project would include energy efficient lighting fixtures, ENERGY Star rated appliances for residential dwelling units, low-flow water features, rain cisterns, and energy efficient mechanical heating and ventilation systems. All of these characteristics would serve to reduce consumption of energy, consistent with State and local regulations and goals. As such, the Proposed Project's energy usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

55 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

56 LADWP, Renewable Energy Program, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-prenewableenergy/a-p-re-renewableenergypolicy?_adf.ctrl-state=n5qya6spv_4&_afrLoop=100538317667626

7. Geology and Soils

In 2015, the California Supreme Court in *CBIA v. BAAQMD* held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the *State CEQA Guidelines* and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents.

The analysis is based on the following reports and documentation:

Geotechnical Engineering Feasibility Report, 3401 South La Cienega Boulevard Los Angeles, California, conducted by Langan Engineering and Environmental Services, Inc. (Langan), April 2021 (see **Appendix E**).

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.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

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

Based on a review of the California Geologic Survey "Earthquake Zones of Required Investigation, Hollywood Quadrangle", the Site is not located within a mapped Alquist-Priolo Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning (AP) Act. The nearest Fault Zone is the Beverly Hills Fault Zone located approximately 550 feet to the west of the Project Site.[57] Review of the CGS Earthquake Zones of Required Investigation, Hollywood Quadrangle as well as the online California Earthquake Hazards Zone Application does not indicate the presence of active surface faulting within or directly adjacent to the Site. Therefore, the potential for surface rupture is considered very low and impacts would be less than significant.

ii. Strong seismic ground shaking?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes. The closest mapped active faults to the site are the Newport-Inglewood Fault, approximately 0.25 miles southwest of the site, Puente Hills (LA) Blind Thrust Fault, approximately 2.2 miles east of the site, Santa Monica Fault, approximately 3.4 miles northwest of the site, and San Vicente Fault, 2.9 miles north of the site. As with any new development in the State of California, building design and construction would be required to conform to the current seismic design provisions of the California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards. Further, construction would also be required to adhere to the seismic design requirements of the Los Angeles Building Code, as well as the General Plan Safety Element, which ensure new buildings are designed to resist ground shaking through modern construction techniques.

The 2016 CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to minimize losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-

57 California Department of Conservation. EQ Zapp: California Earthquake Hazards Zone Application. Available at: https://www.conservation.ca.gov/cgs/geohazards/eq-zapp, accessed August 20, 2021.

related hazards (see Appendix E- Geotechnical Report). The Project consists of a mixed-use development and does not include any characteristics that would result in the exacerbation of existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region and would minimize the potential to expose people or structures to substantial risk, loss, or injury. With compliance with existing regulatory requirements, Project impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. Liquefaction is a transformation of soil from a solid to a liquefied state during which saturated soil temporarily loses strength resulting from the buildup of excess pore water pressure, especially during earthquake-induced cyclic loading. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. As noted in the Geotechnical Report, the Site is located within a state designated liquefaction hazard zone as shown on the "Earthquake Zones of Required Investigation Hollywood Quadrangle" by the CGS**.**

As the Project Site is located in an area designated as potentially liquefiable on the Seismic Hazard Zones maps of the Hollywood and Beverly Hills Quadrangle, a liquefaction analysis of the earth materials within the Project Site was performed as part the geotechnical investigation. A Limited Geotechnical Evaluation for Planning Submission was conducted on February 10, 2021, for the Project Site. The geotechnical subsurface analysis consisted of two soil borings (identified as LB-1 and LB-2). Subsurface conditions encountered up to 5 feet of fill in LB-1 and no fill in LB-2. Fill consisted of clay with varying amounts of sand and was underlain by alluvium. Alluvium consisted of dense to very dense sand with varying amounts of silt, clay, and gravel and were encountered to a depth of 38 and 8 feet in LB-1 and LB-2, respectively. Stiff to very stiff silt and clay with varying amounts of sand and shell fragments were encountered under the sand until the bottom of boring. Groundwater or seepage was not encountered in the borings. Based on available data provided by the State Water Resources Control

Board, the groundwater level in the vicinity of the Site has been measured on the order of 75 to 80 feet below ground surface; however, the historic high groundwater depth was reported between 10 to 15 feet. Thus, a groundwater depth of 15 feet was used in the liquefaction analysis.

Liquefaction was evaluated for LB-1 and LB-2 in accordance with the guidelines titled 'City of Los Angeles Information Bulletin for Liquefaction Analysis Guidelines' effective 1 January 2020.[58] In accordance with the guidelines, two analyses were performed, the first with a two-thirds PGAM and the second with the full PGAM, where PGAM is the Maximum Considered Earthquake geometric mean peak ground acceleration adjusted for site class effects. The thresholds for safety are greater than 1.1 and 1.0 for the two-thirds and full PGAM tests, respectively. The calculated factors of safety against liquefaction at the Project Site are greater than 1.1 and 1.0 at two-thirds PGAM and full PGAM levels of ground shaking.[59] Based on the analysis, the soils encountered at the site are not prone to liquefaction at levels of shaking evaluated.[60] Impacts are considered less than significant.

iv. Landslides?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. Based on review of the "Earthquake Zones of Required Investigation Hollywood Quadrangle" by the CGS, the Site is not located within an 'Earthquake-Induced Landslide' zone. Further, the Project Site is relatively level, with minimal rises or changes in elevation. In addition, the Project Site is not identified by ZIMAS as being located within a landslide hazard zone.[61] Therefore, the project will have no impact with respect to seismic induced landslides.

58 Los Angeles Department of Building and Safety. Liquefaction Analysis Guidelines. Available at: https://www.ladbs.org/docs/default-source/publications/information-bulletins/building-code/ib-p-bc-2020-151-liquefaction.pdf?sfvrsn=974bf753_6, accessed August 20, 2021.

59 PGAM is the Maximum Considered Earthquake geometric mean peak ground acceleration adjusted for site class effects. The analyses used a mode magnitude of 6.4.

60 Langan. Geotechnical Engineering Feasibility Report, 3401 South La Cienega Boulevard, Los Angeles, California, November 2021.

61 Los Angeles Department of City Planning. Zimas. Available at: http://zimas.lacity.org/, accessed August 20, 2021.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project Site is in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site.

Construction of the Proposed Project would involve soil disturbance activities including excavation and grading that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the Proposed Project will be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul route approval from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, on-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) (CGP Order 2009-0009-DWQ) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, which the Project must comply with during construction, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). A site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion

control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). Construction contractors will be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized.

Once operational, the Proposed Project would not be anticipated to result in substantial erosion or loss of topsoil. The Proposed Project would utilize permeable paving throughout the Project Site's open space areas. A rainwater collection cistern would manage stormwater drainage, helping to ensure that the Project Site would not result in significant erosion or loss of topsoil. Drought tolerant plants would also be utilized for landscaped areas once the Proposed Project is operational.

Through compliance with existing regulations, soil erosion impacts from grading and construction activities associated with construction of the Proposed Project will not occur and soil erosion impacts will be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. As discussed above, the Site is not located within an 'Earthquake-Induced Landslide' zone.

Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The surficial blocks are transported downslope or in the direction of a free face, by earthquake and gravitational forces. The site is relatively flat and does not include a free-facing slope in proximity of the site. Therefore, the potential for lateral spreading is considered very low.

Subsidence occurs when large amounts of groundwater have been withdrawn from certain types of rocks, such as fine-grained sediments. In California, large areas of land subsidence were first documented by USGS scientists in the first half of the 20th century. Most of this subsidence was a result of excessive groundwater pumping. The Project Site is not within a subsidence area according to the U.S. Geological Survey.[62]

As discussed previously, the Project Site is considered to be within a liquefaction zone (although, as noted above, further evaluation concluded the soils were not susceptible to liquefaction). In addition, the Project Applicant would be required by LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would confirm the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the Project Site, including areas prone to geologic or soil instability. Through compliance with the LABC and recommendations included in the Final Geotechnical Report, impacts related to geologic and soil instability would be less than significant.

d. Would the project 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. Expansive soils experience swelling or shrinking due to moisture change as a result of cyclic wet/dry weather cycles, irrigation, landscaping, or site grading. Swelling and shrinking soils can result in differential movement of structures, including floor slabs and foundations, and site work, including hardscape, utilities, and

62 U.S. Geological Survey. Areas of Land Subsidence in California. Available at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, acce3ssed September 23, 2021.

sidewalks. Soils that exhibit shrinkage and swelling under these conditions generally consist of plastic clay.

Based on review for the Geotechnical Report of available subsurface data and borings on-site, the soils at or near the approximate planned foundation level are anticipated to be predominantly granular and therefore the potential for expansive soils to be present is anticipated to be very low. Impacts are considered less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project area is currently served by City-owned wastewater treatment and disposal facilities and does not utilize a septic system. The Project would connect to the City's existing sewer system and would not require the use of septic tanks for alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The Proposed Project would be located in an urbanized area on a Site that has been previously developed. In addition to surface level disturbance of the Project Site as part of the current uses, past uses (See **Section IV-5, Cultural Resources**) have included underground storage tanks which indicate a higher level of soil removal and disturbance. While there are no indications of paleontological resources, it is possible that unknown paleontological resources could exist at the Project Site and could be encountered during excavation for the two proposed subterranean parking

levels. Therefore, the Project would implement West Adams – Baldwin Hills – Leimert Community Plan EIR Mitigation Measures as conditions of approval, which would minimize impacts in the event paleontological resources are encountered during construction. Mitigation Measures CR-5 through CR10 will be incorporated into the Project as conditions of approval (See **Table III-3, West Adams – Baldwin Hills – Leimert Community Plan EIR Applicable Mitigation Measures**) and would ensure that the Project's impacts with respect to paleontological resources are less than significant.

8. Greenhouse Gas Emissions

The analysis provided below is primarily based on the Air Quality and Greenhouse Gas Technical Study prepared by Impact Sciences and included as **Appendix B** to this SCEA.

Setting

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer).[63] Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of GHG and other gases to the atmosphere from volcanic eruptions); and
- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

In recent decades, changes in climate have caused impacts on natural and human systems on all continents and across the oceans. Impacts are due to observed climate change, irrespective of its cause, indicating the sensitivity of natural and human systems to changing climate.[64] Continuing changes to the global climate system and ecosystems, and to California, are projected to include:

63 US EPA. 2013. Overview of Greenhouse Gases. Available online at: https://www.epa.gov/ghgemissions/overview-greenhouse-gases. Accessed on August 11, 2018.

64 Intergovernmental Panel on Climate Change. 2013. "Climate Change 2013: The Physical Science Basis." Available online at: http://www.climatechange2013.org/. Accessed August 13, 2018.

- Rapidly diminishing sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures;[65]

- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and ice sheets;

- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;

- Changing levels in snowpack, river flow and sea levels indicating that climate change is already affecting California's water resources;[66]

- Dry seasons that start earlier and end later, evoking more frequent and intense wildland fires;[67] and

- Increasing demand for electricity due to rising temperatures.[68]

The natural process through which heat is retained in the troposphere[69] is called the "greenhouse effect." Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere as short-wave radiation. It travels through the atmosphere without warming it and is absorbed by the Earth's surface. When the Earth re-emits this radiation back toward space, the radiation changes to long wave radiation. GHGs are transparent to incoming short wave solar radiation but absorb outgoing long wave radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

65 Ibid.
66 California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.
67 Ibid.
68 California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.
69 The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface from 6- to 7-miles).

Greenhouse Gas Compounds

California law defines GHGs to include the following six compounds:

- **Carbon Dioxide** (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems.

- **Methane** (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment.

- **Nitrous Oxide** (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- **Hydrofluorocarbons** (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- **Perfluorocarbons** (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- **Sulfur Hexafluoride** (SF_6) is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

Regulatory Framework

Federal

Paris Climate Agreement

The Paris Climate Agreement (Agreement) is an international treaty on climate change adopted on December 12, 2015. The goal of the agreement is to limit global warming to 1.5 degrees Celsius as compared to pre-industrial levels. Countries will aim to reach global peaking of GHG emissions as soon as possible to achieve a climate neutral world

by mid-century. In order to achieve these reductions, the Paris Climate Agreement works on a 5-year cycle of increasingly ambitious climate action carried out by countries. Therefore, by 2020, countries were required to submit their plans for climate action, known as nationally determined contributions. Additionally, the Agreement provides a framework for financial, technical and capacity building support to those countries who need it. Developed counties will take a lead in providing financial assistance to other countries since large scale investments are required for GHG mitigation and climate adaptation.[70]

The United States joined 190 other countries in the Paris Climate Agreement under the Obama administration in September 2016.[71] The United States announced an intention to withdraw from the Agreement in June 2017, and formally notified the United Nations in November 2019. The United States officially withdrew from the Agreement in November 2020.[72] However, January 20, 2021, The United States rejoined the Agreement.[73]

State

Executive Order (EO) S-03-05. On June 1, 2005, EO S-03-05 was issued by Governor Schwarzenegger in order to set statewide emissions reduction standards. The order required the state to reduce GHG emissions to 1990 levels by 2020 and reduce GHG emissions to 80% below 1990 levels by 2050. EO S-3-05 also calls for the Secretary of California Environmental Protection Agency (Cal/EPA) to be responsible for coordination of state agencies and progress reporting.

Assembly Bill (AB) 32

AB 32 (California Global Warming Solutions Act of 2006) which was codified into law in 2006 established the 2020 GHG emissions targets set by EO S-03-05. AB 32 represents the first enforceable statewide program to limit GHG emissions from all major sectors with penalties for noncompliance.

70 United Nations. *The Paris Agreement*. Available online at https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement.

71 The White House. *President Obama: The United States Formally Entered the Paris Agreement*. Available online at: https://obamawhitehouse.archives.gov/blog/2016/09/03/president-obama-united-states-formally-enters-paris-agreement.

72 NPR. *U.S. Officially Leaving Paris Climate Agreement*. Available online at: https://www.npr.org/2020/11/03/930312701/u-s-officially-leaving-paris-climate-agreement.

73 The White House. 2021. *Paris Climate Agreement*. Available online at: https://www.whitehouse.gov/briefing-room/statements-releases/2021/01/20/paris-climate-agreement/.

Senate Bill (SB) 32

SB 32 was signed into law in 2015 and sets into law the mandated reduction targets set in EO B-30-15, which required a reduction in GHG emissions to 40% below the 1990 levels by 2030.

CARB's 2017 Final Scoping Plan

The CARB, in collaboration with over twenty state agencies issued a Final Scoping Plan in 2017 in order to set a framework for the state to meet the overall reduction goals set in SB 32. The 2017 Scoping Plan identified key sectors of the implementation strategy, which includes improvements in low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water. Through a combination of data synthesis and modeling, CARB determined that the target statewide 2030 emissions limit is 260 $MMTCO_2e$, and that further commitments will need to be made to achieve an additional reduction of 50 million metric tons of carbon dioxide ($MMTCO_2e$) beyond current policies and programs. Key elements of the 2017 Final Scoping Plan include a proposed 20% reduction in GHG emissions from refineries and an expansion of the Cap-and-Trade program to meet the aggressive 2030 GHG emissions goal.

Regional

SCAG 2020-2045 Connect SoCal Plan RTP/SCS

On September 3, 2020, the SCAG Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020-2045 RTP/SCS).

Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whole collaboration can improve the quality of life for Southern Californians. In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's greenhouse gas emission reduction goals and federal CAA requirements. The plan also strives to achieve broader regional objectives, such as the preservation of natural lands, improvement of public health, increased roadway safety, support for the region's vital goods movement industries and more efficient use of resources.

Local

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City of Los Angeles General Plan (City Air Quality Element), adopted on November 24, 1992, sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges that numerous efforts are underway at the regional, county and City levels addressing clean air concerns and that coordination of these various efforts, and the involvement of the area's residents are crucial to the attainment of the federal and state AAQS. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and clean air goals. Mutually reinforcing strategies need to be developed which work to reduce the use of single occupant vehicles and which work to reduce vehicle trips and vehicle miles traveled (VMT). The Air Quality Element established six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

L.A.'s Green New Deal (Sustainable City pLAn 2019)

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019). Rather than an adopted plan, the Green New Deal is a mayoral initiative that

consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives. L.A.'s Green New Deal (Sustainable City pLAn 2019) is the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates in even more detail L.A.'s vision for a sustainable future and it addresses climate change with accelerated targets and new aggressive goals. While not a plan adopted solely to reduce GHG emissions, climate mitigation is one of eight explicit benefits within L.A.'s Green New Deal that help define its strategies and goals.

These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5% by 2025 and 25% by 2035.
- Reduce building energy use per square feet for all building types 22% by 2025; 34% by 2035; and 44% by 2050.
- All new buildings will be net zero carbon by 2030 and 100% of buildings will be by 2050.
- Ensure 57% of new housing units are built within 1,500 feet of transit by 2025; 75% by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or 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.
- Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050.
- 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, and phase out single-use plastics by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure proportion of Angelenos living within 0.5 miles of a park or open space is at least 65% by 2025; 75% by 2035; and 100% by 2050.

West Adams, Baldwin Hills, Leimert Community Plan

The West Adams – Baldwin – Leimert Community Plan was updated in 2016 and includes the Crenshaw District and the neighborhoods of Leimert Park, Hyde Park, Jefferson Park, Mid-City, West Adams, and Arlington Heights. The Plan EIR was issued in September 2012 which included a series of mitigation measures for new projects within the Plan Area Mitigation Measures GHG-1 from the West Adams – Baldwin – Leimert Community Plan EIR which requires developers to implement applicable GHG reduction measures in project design and comply with regulatory targets will be incorporated into the Proposed Project. See **Table III-3 West Adams – Baldwin Hills -Leimert CPA EIR Applicable Mitigation Measures.**

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 any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Proposed Project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the *State CEQA Guidelines* which provides the lead agency with discretion to determine whether to quantify GHG emissions or rely on a qualitative analysis or performance-based standard.

Pursuant to Appendix G of the *CEQA Guidelines*, a significant GHG impact is identified if the Proposed Project could conflict with applicable GHG reduction plans, policies, or regulations.

For this Project, quantification of GHG emissions is provided for informational purposes. Significance, under CEQA, is based on the project's consistency with statewide and regional policies and plans to meet the state reduction goals set in SB 32, specifically CARB's 2017 Scoping Plan, SCAG's 2020 Connect SoCal RTP/SCS, the City of Los Angeles General Plan, and the City of Los Angeles Green New Deal.

The Proposed Project will generate carbon dioxide, which is the primary component of GHGs. Thus, the project will contribute to global warming as described by the

Intergovernmental Panel on Climate Change. GHG emissions are categorized into three groups or scopes. Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.[74] The quantification of GHG emissions presented below accounts for Scope 1 and Scope 2 emissions. Scope 3 emissions are not under the control of the Proposed Project and are not required to be disclosed under the EPA's GHG Corporate Protocol.[75]

In total, the Project will generate 3,049 metric tons of CO_2 during construction[76] and 9,465 metric tons per year for operations, as explained in the **Air Quality and Greenhouse Gas Technical Report, Appendix B**.

Consistency with the Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and establishes emissions reduction strategies necessary to meet SB 32's 2030 reduction goals. **Table IV-11, Proposed Project Consistency with CARB Applicable 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies,** identifies the Scoping Plan policies that are applicable to the Proposed Project. As shown, the Proposed Project would be consistent with the Scoping Plan.

74 Carbon Trust. *Briefing: What are Scope 3 Emissions?* Available online at: https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions#:~:text=Scope%201%20covers%20direct%20emissions,in%20a%20company's%20value%20chain., accessed May 26, 2021.

75 U.S. Environmental Protection Agency. 2021. *Scope 3 Inventory Guide*. Available online at: https://www.epa.gov/climateleadership/scope-3-inventory-guidance.

76 Construction emissions amortized over thirty years is approximately 101.6 MT CO2e/year.

Table IV-11
Proposed Project Consistency with CARB 2017 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
Implement SB 350 by 2030:	
• Increase the Renewables Portfolio Standard to 50% of retail sales by 2030 and grid reliability	**Consistent.** The measure is not related to development projects but intended for energy providers. Nevertheless, the Proposed Project intends to purchase 100% green power from the Los Angeles Department of Water and Power (LADWP) grid.
• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	**Consistent.** This measure is directed towards policymakers, not development projects. Nevertheless, the Proposed Project is required to meet CALGreen Building Standards by including measures designed to reduce energy consumption. The Proposed Project will also include LED lighting, achieve LEED Gold, and incorporate ENERGY STAR appliances to reduce energy consumption.
• Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in the IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions planning targets through a combination of measures as described in IRPs.	**Consistent.** The Proposed Project is required to adhere to the latest CALGreen Building Standards and Title 24, which will result in a more efficient project site. In addition, the Proposed Project includes design measures to reduce electricity use, including LED lighting, ENERGY STAR appliances, and purchasing green power 100% green power from the LADWP grid.
Implement Mobile Source Strategy (Cleaner Technology and Fuels): • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."	**Consistent.** This measure is directed towards policymakers, not development projects. Nevertheless, the Proposed Project is located adjacent to the La Cienega/Jefferson Metro station. As a result, the Proposed Project will reduce VMT by locating residents and job opportunities near a major transit line (See **Transportation**).
By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road use, parking pricing, transit discounts).	**Consistent.** This measure is directed towards policymakers, not development projects. However, the Proposed Project will provide housing and job opportunities near the Jefferson/La Cienega Metro station that will encourage transit use.

Strategy	Project Consistency
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	**Consistent.** This measure is directed towards CARB, CalRecycle, California Department of Food and Agriculture, State Water Regional Control Board, and local air districts. Nevertheless, since the Proposed Project will be operational after this year, the Proposed Project's waste collection service will be required to be compliant with AB 341 which outlines the statewide waste reduction goals.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	**Consistent**. The Proposed Project will be required to adhere to the latest CALGreen Building Standards and Title 24. In addition, the Proposed Project includes a series of design measures that will reduce GHG emissions across multiple sectors. Specifically, to reduce GHG emissions from the energy sector, the Proposed Project will install LED lighting, ENERGY STAR appliances, design the building to be completely electric, and will purchase 100% of green power from the LADWP grid. Further, to reduce emissions from the transportation sector, the Proposed Project will include 100 electric vehicle (EV) parking spaces, bicycle parking and storage, and is located next to a major transit station. Finally, in order to reduce GHG emissions associated with water use, the Proposed Project will be designed with drought tolerant plants and will include a rainwater collection cistern that will be used to water on-site landscaping.

Source: Impact Sciences, 2021.
CARB. California's 2017 Climate Change Scoping Plan. Available online at: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed February 5, 2021.

Based on this evaluation, this analysis finds the Proposed Project would be consistent with all feasible and applicable strategies recommended in the 2017 Scoping Plan Update.

Consistency with Connect SoCal

At the regional level, the Connect SoCal RTP/SCS represents the region's Climate Action Plan that defines strategies for reducing GHGs. To assess the Proposed Project's potential to conflict with the RTP/SCS, this section analyzes the Proposed Project's land use profile for consistency with those in the RTP/SCS. Generally, proposed 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.[77]

Table IV-12, **Proposed Project Consistency with Connect SoCal,** demonstrates the Proposed Project's consistency with the strategies set forth in the Connect SoCal Plan. The Proposed Project would also be consistent with the applicable strategies set forth in Connect SoCal's "A Path to Greater Access, Mobility, & Sustainability" chapter. Therefore, the Proposed Project would be consistent with the GHG reduction actions and strategies contained in Connect SoCal.

Table IV-12
Proposed Project Consistency with Connect SoCal

Actions and Strategies	Consistency Analysis
Focus Growth Near Destinations & Mobility Options	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations	**Consistent:** The Proposed Project would construct 260 residential units and office space approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project will include on-site secure bicycle parking that will promote active transportation.
Focus on job/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**Consistent:** The Proposed Project would construct commercial and residential space that will provide job and housing opportunities approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.
Plan for growth near transit investments and support implementation of first/last mile strategies	**Consistent:** The Proposed Project would construct commercial and residential space that will provide

77 Southern California Association of Governments. 2020. *Connect SoCal*. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

Actions and Strategies	Consistency Analysis
	job and housing opportunities approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	**Consistent:** The Proposed Project would redevelop an existing Public Storage facility near an existing Metro Expo Line station to construct a mixed-use development that will facilitate transit use from residents and employees living or working on the site.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	**Consistent:** The Proposed Project will redevelop an existing Public Storage facility in the City with a mixed-use development with residential units, job opportunities located near major transit and as well as other residential and commercial areas.
Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	**Consistent:** The Proposed Project would construct 260 residential units and office space approximately 100 feet from the Metro Expo line Jefferson/La Cienega station. The Proposed Project will include on-site secure bicycle parking, showers, and storage that will promote active transportation.
Promote Diverse Housing Crisis	
Preserve and rehabilitate affordable housing and prevent displacement	**Consistent:** The Proposed Project will redevelop an existing Public Storage facility and would not displace any affordable housing units. Instead, the Proposed Project will construct housing on the Proposed Project Site, including 22 affordable residential units.
Identify opportunities for new workforce and affordable housing development	**Consistent:** The Proposed Project is a mixed-use development with 260 residential uses including 22 affordable residential units, 7 workforce housing units, and will provide job opportunities through the proposed commercial space.
Leverage Technology Innovations	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedications lanes, charging and parking/drop-off space	**Consistent:** This strategy is aimed at local government to promote shared bikes and scooters, electric vehicles, ride sharing and provide safe infrastructure such dedicated lanes, charging and parking/ drop-off space. The Proposed Project would not interfere with such policymaking. Additionally,

Actions and Strategies	Consistency Analysis
	the Proposed Project will promote the advancement of low emission technologies across the community by providing EV parking spaces. Furthermore, the Project will include 222 bicycle parking spaces and will provide a linkage to the existing bike path on the northern border of the Project Site.
Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Not Applicable:** This strategy is aimed at local government to identify ways to incorporate "micro-power grids." The Proposed Project would not interfere with such policymaking.
Promote a Green Region	
Promote more resource efficient development focused on conservation, recycling and reclamation	**Consistent.** The Proposed Project will be required to adhere to the latest CALGreen Building Codes and Title 24, which will result in a more efficient proposed project site. Moreover, the Proposed Project site lies within 100 feet of a major transit station that will promote public transit and reduce vehicle trips to the site. The Proposed Project will focus on water and energy efficiency in design by constructing the site with a drought tolerant landscape, rainwater collection cistern, LED lighting, and ENERGY STAR appliances. Additionally, the Proposed Project will be 100% electric with the intention to purchase 100% of green power from LADWP's grid.
Preserve, enhance and restore regional wildlife connectivity	**Not Applicable:** The Proposed Project will be constructed in an existing urban setting. The Proposed Project would not interfere with this goal.
Reduce consumption of resource areas, including agricultural land	**Consistent**. The Proposed Project will be constructed in an existing urban setting and, as a result, will not consume any resource areas or agricultural land.
Identify ways to improve access to public park space	**Consistent.** While this strategy calls on local governments to improve access to public park space, and the Proposed Project would not interfere with this goal. In fact, the Proposed Project site lies approximately 600 feet east of the Syd Kronenthal Park and is adjacent to the open space component of the Samitaur Office Building located at 5850 W. Jefferson Blvd. Therefore, residents and employees of the proposed will have access to open space and public parks.

Actions and Strategies	Consistency Analysis

Source: Impact Sciences, 2021.
SCAG. 2019. Connect SoCal – The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Chapter 3: A Path to Greater Access, Mobility, & Sustainability. Available online at: https://www.connectsocal.org/Documents/Draft/dConnectSoCal-03_Draft-Plan.pdf, accessed October 19, 2020.

Consistency with City of Los Angeles General Plan Air Quality Element

The Proposed Project would be consistent with the City's General Plan, specifically its Air Quality Element (see **Section 4.3**). While the Element did not explicitly address control of GHG emissions, global climate change, or resiliency objectives, it did identify several goals to reduce criteria pollutant emissions that would also work to reduce GHG emissions that contribute to climate change, see **Table IV-13, Consistency with the Air Quality Element.**

Table IV-13
Project Consistency with the Air Quality Element

Goal	Consistency Analysis
Good air quality and mobility in an environment of continued population growth and health economy.	**Consistent:** The Proposed Project would construct 260 residential units and commercial space approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project will include on-site secure 222 bicycle parking spaces that will promote active transportation. Therefore, by placing housing and commercial space near transit and providing opportunities for alternative mobility options, the Proposed Project will help improve air quality and mobility by reducing the number of gas/diesel-fueled vehicles on the road.
Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**Consistent:** The Proposed Project would construct 260 residential units and commercial space approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver

Goal	Consistency Analysis
	City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project will include on-site secure bicycle parking (222 spaces) that will promote active transportation. Therefore, by placing housing and commercial space near transit and providing opportunities for alternative mobility options, the Proposed Project will help reduce reliance on single-occupant vehicles with fewer commute and non-work trips.
Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.	**Consistent:** The Proposed Project would minimize congestion impacts in the region because of the Project Site's proximity to public transit.
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.	**Consistent.** The Proposed Project would replace an existing Public Storage facility with an infill project with residential and commercial uses near a major public transportation line. The Proposed Project is consistent with the Element's focus on growing near transit facilities.
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 free parking.	**Consistent.** The Proposed Project would replace an existing Public Storage facility with an infill project with residential and commercial uses near public transit. The Proposed Project will use resources (electricity, petroleum) efficiently (as described above). Furthermore, the Proposed Project will be required to be consistent with CalGreen and Title 24 standards. The Proposed Project will construct completely electric buildings, include long-term and short-term bicycle parking, and construct 100 EV parking spaces which will further reduce reliance on polluting fuels.

Source: Impact Sciences 2021.
City of Los Angeles. Air Quality Element. Available online at: https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

Consistency with City of Los Angeles Green New Deal

In 2019, the City of Los Angeles released the Green New Deal as an update to the City's 2015 Sustainable City pLAn. The City's Green New Deal is an expanded vision of the pLAn and aims to guide the City's transition to a more sustainable future. The Green New

Deal sets forth a series of accelerated targets that will reduce GHG emissions. Many of these targets are not applicable at the project level; however, the Proposed Project will still further the overall goal where applicable, as explained in **Table IV-14, Consistency with the City's Green New Deal**.

Table IV-14
Project Consistency with the City's Green New Deal

Targets	Consistency Analysis
Supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.	**Consistent.** This measure is directed at energy providers to increase the amount of renewable energy created. The Proposed Project will not interfere with this target. Nevertheless, the Proposed Project will implement a series of design features that will reduce energy demand including ENERGY STAR appliances and LED lighting. The Proposed Project will also purchase green power from the LADWP grid which will promote this target.
Source 70% of our water locally by 2035, and capture 150,000 acre feet per year of stormwater by 2035.	**Consistent.** This target is directed at water suppliers to increase the amount of local water provided. To support this target, the Proposed Project will include a rainwater collection cistern for stormwater management and for reuse in landscaping onsite. Therefore, the Proposed Project will promote local water use in its landscaping as well as stormwater capture.
Reduce building energy use per square foot for all types of buildings by 22% by 2035; 34% by 2035; and 44% by 2050.	**Consistent:** The Proposed Project would replace an existing Public Storage facility with an infill project with residential and commercial uses. The Proposed Project will be required to adhere to the latest CalGreen Building Standards and Title 24 requirements that will result in a more efficient building per square foot than the existing uses on the site. Moreover, the Proposed Project will implement a series of design features that will reduce energy demand including ENERGY STAR appliances and LED lighting.
Reduce Vehicle Miles Traveled per capita by at least 13% by 2025, 39% by 2035, and 45% by 2050.	**Consistent.** The Proposed Project would construct 260 residential units and commercial space approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project will include on-site secure bicycle parking (222 spaces) that will promote active transportation.

Targets	Consistency Analysis
	As a result, the Proposed Project will encourage active and public forms of transportation for residents, visitors, and employees which will reduce VMT.
Ensure 57% of new housing units are built within 1,500 feet of transit by 2035; and 75% by 2035.	**Consistent.** The Proposed Project will construct 260 new residential units approximately 100 feet from the Jefferson/La Cienega Metro station. Furthermore, the Project area is served by Metro Bus Lines 38, 105, Culver City Bus Line 4, and County of Los Angeles Baldwin Hills Parklands Shuttle (weekend only) which have frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods.

Source: Impact Sciences, 2021.
City of Los Angeles. 2019. L.A.'s Green New Deal. Available online at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf.

Conclusion

The Proposed Project is an infill urban development in close proximity to transit which places residences, amenities, and jobs within walking distance (100 feet) of the Jefferson/La Cienega Metro Expo station. The Proposed Project would provide bicycle parking on-site to promote pedestrians and bicycle travel. In addition, the Proposed Project will implement PDF-1 which requires installation of ENERGY STAR appliances, LED lighting, a rainwater collection cistern, and EV parking. In addition, the Proposed Project intends to purchase green power from the LADWP grid and landscape the site with drought tolerant plants.

As a result, the Proposed Project is consistent with CARB's 2017 Scoping Plan, SCAG's Connect SoCal 2020 RTP/SCS, the City of Los Angeles General Plan Air Quality Element, and the City of Los Angeles Green New Deal. Furthermore, the Proposed Project will be constructed consistent with CALGreen Building Code, LEED Gold, and Title 24 which ensure efficient use of energy. For these reasons, the Proposed Project would not conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing the emissions of GHG. Impacts would be less than significant.

9. Hazards And Hazardous Materials

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use building (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with the Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The Proposed Project includes demolition and removal of the nine existing buildings and surface parking lot from the Project Site and construction one commercial and one residential building with two subterranean levels of parking. The types of hazardous materials that would be found on the Project Site during the operation of the Project would be typically associated with commercial and residential land uses – paints, cleaning supplies, and small amounts of petroleum products. The Project would not require the routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal of small amounts of hazardous materials, compliance with existing local, State, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. As described in the Phase I and Phase II ESA for the Proposed Project, past uses have included hazardous materials. However, there are no regulatory records of the site to indicate significant releases or contamination.[78] See question (b) for further discussion of the handling of hazardous materials. Therefore, the Project's impacts related to this issue would be less than significant.

78 California Department of Toxic Substances Control. Envirostor. Available at: https://www.envirostor.dtsc.ca.gov/public/

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?)

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. Phase I and Phase II Environmental Site Assessments (ESA) were conducted for the site. At the time of the reconnaissance, the Site was occupied by nine buildings utilized by Public Storage for commercial self-storage. Onsite operations include the rental of storage units with an onsite residence for the property manager. Site improvements include the nine buildings, asphalt paved drive aisles and parking, refuse enclosures, and fire hydrants. Three Recognized Environmental Conditions (RECs) were identified in the report and are described below. A REC is defined as:

> *"The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions."*[79]

Underground Storage Tank. Based on a review of historical permits, a 15,000-gallon Underground Storage Tank (UST) was installed at the Site, likely in 1947 during the initial Site development, and was located immediately west of the northwest corner of the main on-site building. The documented content of the UST was paraffin wax, which was used in the manufacturing of matches by the Universal Match Company. Paraffin wax is a flammable, soft, colorless semi-solid waxy substance consisting of a mixture of saturated hydrocarbons. Based on available information, the UST was used until the mid to late 1970s (approximately 30 years) and it is unclear whether it was removed. The UST does not appear to have been used to store contents other than paraffin wax.

The Site was listed on the RCRA NonGen/NLR, UST, HAZNET, HWTS and ECHO regulatory databases, under the 3401 South La Cienega Boulevard address. The historical address of 5721 West Jefferson Boulevard was not listed on any databases.

79 American Society for Testing Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13)

The UST listing, identified only by the address, reports the status as Historical but does not provide any additional information. As previously discussed, reviewed documents indicate that a 15,000-gallon paraffin wax UST was installed to the west of the main building in 1947. Public Storage (also listed as Public Storage 69191) was listed on the RCRA NonGen/NLR, HAZNET, HWTS and ECHO databases. These listings suggest that the facility is designated as a handler of hazardous waste but did not generate hazardous waste.

Results for soil samples evaluating the UST conclude that shallow soil (0.5 feet) at soil sampling location B-1 through 5 have concentrations of arsenic that exceed residential SLs and/or typical background levels for California soils. Under a residential redevelopment scenario, these soils will need to be permanently removed from the Site. Based upon the results of soil sampling at the former UST, TPH is not considered a chemical of potential concern (COPC). However, it was not possible to collect soil samples directly at the former location of the UST because it underlies the northern end of current Building G.

Railroad Spur. Based on reviewed records, including aerial photographs, topographic maps, and the historical diagram from circa 1950, a railroad spur existed on-Site to the immediate north of the main building. This railroad spur stemmed from the main line of the Southern Pacific Railroad that existed north of the Site. In approximately 2010, the right-of way for the railroad was converted into the present-day Metro Expo Line which is situated on platform raised approximately 15-20 feet above street level. Railroad spurs are known sources of shallow soil contamination from a variety Chemicals of Potential Concern (COPCs), including metals, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), pesticides, and polychlorinated biphenyls (PCBs). It is unknown whether the railroad spur materials, such as the streel lines, ballast and underlying structural base, were fully removed from the Site during Site redevelopment.

For the evaluation of the railroad spurs, shallow soil (0.5 feet) at soil sampling locations R-1 and R-2 have concentrations of arsenic, and lead that exceed residential Screening Levels (SLs) and/or typical background levels for California soils. Under a residential redevelopment scenario, these soils will need to be permanently removed from the Site.

Former Match Manufacturing. Prior to Public Storage, the Site was primarily used as a match manufacturing operation by Universal Match Company from the initial development in 1947 to the mid/late 1970s. In addition to the paraffin wax stored in the UST, other hazardous materials used and maintained on Site included phosphorus, glue, water-soluble dyes, sulfur, and inert materials such as sand, glass and clay. According to permits reviewed and research on historical match making processes, wooden sticks are

often soaked in phosphate, which serves as a fire retardant; while the inert materials (sand, glass, and clay) are used on the tips of matches to increase the friction and control the burning rate. Materials such as sulfur were used to sustain combustion and water-soluble dyes were often added to give the match head a color such as red or blue. No specific information regarding the size and quantities, or the handling and disposal, of chemicals or hazardous material was found during the historical research.

Although the possibility of the former on-Site use of solvents could pose a potential vapor intrusion risk to future occupants, the former match manufacturing activities are not believed to have been solvent intensive. In addition, it is noted that proposed development plans for the Site include excavation to depths between 15 and 30 feet below surface in the area of the main building to accommodate parking and footings for future structures.

Based on the Proposed Project's plans to develop the site, the following mitigation measures would be required to reduce impacts to below a significant level.

Mitigation Measures

HAZ-1 In accordance with the recommendations of the Phase II ESA, prior to Project construction, the Applicant shall develop a plan to ensure proper excavation and permanent removal of soils that exceed screening criteria for lead and arsenic. The Applicant shall prepare a Soil Management Plan (SMP) to address the following:

- Provide clear soil management procedures and protocols to be used at the Site during excavation and construction earthwork activities in the area of the suspected former UST after the overlying structure is fully demolished and other areas where COPCs may be present.
- Provide procedures and protocols for UST abandonment with the City of Los Angeles Fire Department, if necessary.
- Provide worker safety guidelines and soil management/handling protocols in the event that potentially contaminated soil is disturbed; and
- Provide contingency procedures to address previously unexpected environmental conditions, if encountered.

- Provide soil sampling and screening criteria for reuse of potentially impacted soils encountered during excavation and/or grading activities, including recommended laboratory analyses, stockpile management, and off-Site profiling and disposal options.

The Proposed Project would be required to comply with all local, State, and federal regulations concerning the release of hazardous materials. Furthermore, **Mitigation Measures HAZ-1** would reduce potential impacts due to the release of hazardous materials into the environment to less than significant. Therefore, with the incorporation of these mitigation measures, there would be no 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. 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☒	☐	☐

Less than Significant with Mitigation. The closest schools are the Echo Horizon Elementary School and Baldwin Hills Elementary School, which are more than 1,200 feet and 2,200 feet away, respectively. Echo Horizon Elementary School is within one-quarter mile from the Project Site, but Baldwin Hills Elementary School is not. However, the Project's operation would not produce hazardous emissions or handle hazardous materials, substance, or waste; Furthermore, construction activities that include handling hazardous waste would comply with **Mitigation Measure HAZ-1** and be reduced to a less than significant level. Therefore, the Proposed Project would have a less than significant impact associated with the emission of hazardous materials near an existing or proposed school.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. The Project Site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CAL/EPA).[80] The Project Site is used as a public storage site, which is not a land use associated with hazardous materials. Searches conducted using the California State Water Resources Control Board Geotracker and the Department of Toxic Substances Control EnviroStor did not reveal any open cases for potentially hazardous sites within 1,000 feet of the Project Site.[81]

However, the Phase I ESA noted the Project Site was listed on the RCRA NonGen/NLR, UST, HAZNET, HWTS and ECHO regulatory databases, under the 3401 South La Cienega Boulevard address. The historical address of 5721 West Jefferson Boulevard was not listed on any databases. The UST listing, identified only by the address, reports the status as Historical but does not provide any additional information. As previously discussed, reviewed documents indicate that a 15,000-gallon paraffin wax UST was installed to the west of the main building in 1947. Public Storage (also listed as Public Storage 69191) was listed on the RCRA NonGen/NLR, HAZNET, HWTS and ECHO databases. These listings suggest that the facility is designated as a handler of hazardous waste but does not generate hazardous waste.

Compliance with **Mitigation Measure HAZ-1** would ensure any potential previous hazardous materials on the site are evaluated and mitigated. Therefore, the Project would not create a significant hazard to the public or environment since it is not located on a hazardous materials site compiled pursuant to Government Code Section 65962.5 and would not otherwise create such a significant hazard. With the incorporation of **Mitigation Measures HAZ-1**, impacts would be less than significant.

80 Roux Associates, Inc. 2020. Phase II Subsurface Investigation Report: 3401 South La Cienega Boulevard.

81 California State Water Resources Control Board. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=3401+la+cienega

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. A significant impact may occur if a project is located within two miles of a public airport, and subject to a safety hazard or within the vicinity of a private airstrip. Santa Monica Airport, the public airport nearest to the Project Site, is approximately 4 miles west of the Project Site. The Project Site not located within an airport land use plan. Therefore, no impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. Neither the construction nor operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan, and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the Los Angeles Fire Department (LAFD) and the Department of Building and Safety to

develop an emergency response plan for the Project in consultation with the LAFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan as required by the City would ensure that Project impacts related to emergency response 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project Site is not located within a designated Very High Fire Hazard Severity Zone or Fire Brush Clearance Zone.[82]

In addition, the Project Site is surrounded by urban development and not adjacent to any wildlands. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires, and the Project would have no associated impacts.

10. Hydrology And Water Quality

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is

82 City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA. Available at: https://navigatela.lacity.org/navigatela/, accessed February 22, 2021.

responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would violate the state's water quality standards, and therefore have a significant impact on surface water quality, if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water, which does not meet the quality standards of agencies which regulate surface water quality and water discharge, into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations regarding surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts. The Proposed Project would be required to follow all applicable regulations.

Further, as required under the NPDES, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of best management practices to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

During the operation, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011, and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a SUSMP if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. The Proposed Project does not include any

point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Therefore, the Project would result in a less than significant impact to water quality and waste discharge during its construction and operation, and no further analysis is required.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from the Metropolitan Water District (MWD) (49%)snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (38%), local groundwater (11%), and recycled water (2%).[83] Based on the City's most current Urban Water Management Plan, in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet per year. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.[84]

The Project Site is in an urbanized area of the City and is currently completely developed with impervious surfaces. During a storm event stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions. Based on the Geotechnical Study conducted for the Project Site, the historic high groundwater depth was reported between 10 to 15 feet.[85] The depth of excavation for the Project's two subterranean levels would exceed this depth. Therefore, temporary dewatering may be required during construction. However, the amount of groundwater infiltration likely to occur would be minimal given the small area and depth to the proposed excavation.

83 Los Angeles Department of Water and Power. Facts and Figures – Water Supply Sources (5-year average) – Fiscal Year 2015-2019. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=t6q7wu6ee_4&_afrLoop=1023653675697584

84 Los Angeles Department of Water and Power. Urban Water Management Plan. 2020. Available at: https://wuedata.water.ca.gov/public/uwmp_attachments/9314518570/1.%20LADWP%202020%20UWMP.pdf, accessed September 23, 2021.

85 Langan Engineering and Environmental Services, Inc (Langan). October 2020. Geotechnical Engineering Due Diligence Report, 3401 South La Cienega Boulevard Los Angeles, California.

In addition, all potential dewatering operations would be conducted in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Project Site would be minimally affected.

Throughout Project operations, all water consumption associated with the Project would be supplied by LADWP and not from groundwater beneath the Project Site. Therefore, the Proposed Project's potential impacts relating to dewatering would be less than significant. To further reduce any impacts to groundwater during Project operations, the Project, as part of its sustainability concept, would include elements such as stormwater filtration, hardscape materials such as pavers that allow for filtration, and a rainwater collection cistern for stormwater management and reuse of water for landscaping on site. Impacts related to groundwater supplies would be less than significant.

c. *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner, which would:*

   i. *result in substantial erosion or siltation on-or off-site?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. A significant impact would occur if the Proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project Site is located in a highly urbanized area within the City of Los Angeles. There are no natural watercourses on the Project Site or in the vicinity of the Project Site. While Ballona Creek lies approximately 600 feet to the west of the Project Site, the Proposed Project would not alter its course. As stated previously, the Project Site is almost entirely covered by impervious surfaces and current stormwater runoff flows to the local stormdrain system during a storm event. The Project would not increase the amount of impervious surfaces already present at the Project Site.

Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during

construction of the Proposed Project. Further, the Project would be required to implement a LID Plan (during the Project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the Project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site.

ii. result in flooding on-or off-site?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The Project Site is currently developed and fully paved, and the Proposed Project would not substantially change the site's drainage patterns and would not alter a discernable drainage course resulting in flooding. As discussed above, the Project would implement both a SWPPP and a LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site.

Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, as discussed above, construction and operation of the Proposed Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. Since the Project would not involve alteration of a discernable watercourse and the Project would be required to comply with the LID Ordinance which would reduce the amount of surface water runoff leaving the Project Site. Therefore, the Proposed Project would not have the potential to alter drainage patterns or increase runoff such that flooding would occur. Therefore, impacts would be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. As noted above, the Project Site is generally flat and is currently occupied by a public storage facility and surface parking. Grading and construction activities on the Project Site may temporarily alter the existing drainage patterns and change off-site flows. However, as discussed above, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction. Compliance with the LID Ordinance, discussed above, would also reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. In addition, one of the sustainable features included in the Project is the collection of rainwater during operation. As part of the Project's sustainability concept, the Project would include elements such as stormwater filtration, hardscape materials such as pavers that allow for filtration, and an overall target of managing 80th percentile storm events with BMPs. Therefore, impacts related to runoff would be less than significant.

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or best management practices, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains.

First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-housekeeping" practices would ensure that short-term construction-related impacts would be less than significant.

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the Project Site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants resulting from Project operation, including petroleum products associated with parking and circulation areas, would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the Project's construction impacts related to storm drain capacity and water quality would be less than significant.

Activities associated with operation of the Project could generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Through compliance with existing regulations and the approved LID Plan, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

iv. impede or redirect flood flows?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[86] While the Ballona Creek is located approximately 550 feet west of the Project Site across Jefferson Boulevard, it is a concrete-lined channel completely surrounded by urban uses, including light industrial and commercial uses. Thus, the Project would not have the potential to impede or redirect flood flows, and no impact would occur.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. The Project Site is identified in the Safety Element of the General Plan as being located in a potential inundation area but is not within a tsunami or seiche zone.[87] However, the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing dam facilities. None of the 13 dams in the greater Los Angeles area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.[88] To further ensure against dam failure, the LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement

86 Los Angeles County Department of Public Works. Flood Zone Determination Website. Available at: https://pw.lacounty.gov/floodzone/, accessed May 5, 2021.

87 City of Los Angeles. 1996. Safety Element of the Los Angeles City General Plan. Exhibit G: Inundation & Tsunami Hazard Areas. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed May 5, 2021.

88 Los Angeles General Plan Safety Element, Page II-16

and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. LADWP conducts surveillance of the reservoirs as required by DSOD.[89] Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. As such, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the Project. Therefore, impacts related to flooding and risk of release of pollutants would be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant. As discussed above, the Proposed Project would be responsible for the preparation of a SWPPP and implementation of best management practices to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

Therefore, the Project would comply with applicable water quality control plans as analyzed above. Additionally, the Project Site would be constructed on a site previously developed and would not substantially increase the amount of impervious surface. Therefore, implementation of the Proposed Project would not conflict with or obstruct implementation of any other water quality control plans or sustainable groundwater management plans. Impacts are less than significant.

89 Los Angeles Department of Water and Power, Water Infrastructure Plan 2016 http://rates.ladwp.com/UserFiles/Rates%20Documents/2016/Water_Infra_Plan_2016.pdf

11. Land Use And Planning

a. Would the project physically divide an established community?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than significant. An impact would occur if the Project would include extensions of roadways or other development features through currently developed areas that could physically divide or isolate existing neighborhoods or an established community. The Project Site is an infill development in an established urbanized area of the City that is already served by a well-developed roadway system and utility infrastructure. The Project Site does not propose to change any of the public circulation in the Project vicinity that would physically divide or isolate existing neighboring developments. The Project also would not physically divide an existing community, as the site is surrounded by similar, compatible development in all directions. Immediately to the north and west of the Project Site are two new developments proposing mixed-use and office space towers, respectively – the 16-story "(W)rapper" office building to the west and the 320-foot tall multifamily, commercial and retail "Cumulus" development to the north. To the east of the Project Site across South La Cienega Boulevard is a five-level parking structure serving as parking for Metro patrons. South of the Project Site along South La Cienega Boulevard is a single-story Sees' Candies factory. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site.

The Project would in fact unite the surrounding uses by incorporating the existing bicycle path along Jefferson Boulevard into the Project design, providing a plaza directly connecting the Project Site to the Jefferson / La Cienega Metro station, and providing over 30,000 sf of publicly accessible ground floor amenities to integrate the Project into the neighborhood. Whereas the existing self-storage development on the Property is entirely enclosed within a fence and not open to the general public, the Project will replace that with a porous site that allows visitors to and users of the Project Site to pass through it to reach neighboring properties and amenities.

Therefore, the Project would not physically divide an established community.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than significant. The Proposed Project is seeking the following discretionary approvals (collectively referred to as Project Entitlements):

- Approval of a Site Plan Review for a project which creates more than 50 dwelling units and more than 50,000 sf of nonresidential floor area under LAMC Section 16.05.

- Approval under California's DBL and LAMC Section 12.22-A.25 of the following in exchange for setting aside 11% of the Project's base units for very low-income households:

  a) A 35% increase in the permitted residential density,

  b) A residential parking ratio of 0.5 (1/2) parking stalls for each residential unit pursuant to California Government Code § 65915(p)(2)(A), as modified by Assembly Bill 2345,

  c) One Off-Menu Incentive to allow up to 92 feet in height for the commercial building and 149 feet 6 inches in height for the residential building (excluding architectural features and mechanical, solar, and other structures), and

  d) A second Off-Menu Incentive to exceed the CPIO cap on parking (limiting parking to 50% of the LAMC minimum parking requirements) to allow up to 785 parking stalls total, 413 of which are to be unbundled

- A Conditional Use ("CUB") to allow one establishment at the Project to sell and dispense a full line of alcoholic beverages (beer, wine, and liquor) for on-site consumption and the incidental sale of beer and wine for off-site consumption pursuant to LAMC § 12.24-W.1(a).

- A CPIO Administrative Clearance under the West Adams – Baldwin Hills – Leimert CPIO Section 6.C.2 for a project in compliance with all applicable provisions of the CPIO, as modified by the DBL and LAMC § 12.22-A.25.

- VTTM to subdivide the Project Site into five lots (four airspace lots and one master ground lot) with one of the airspace lots to have up to 260 residential condominium units under LAMC Section 17.06 and Section 17.15, along with a waiver of the required 2-foot dedication for sidewalk widening purposes along South La Cienega Boulevard, and an approval of a Haul Route in conjunction with the VTTM approval.

The Proposed Project Entitlements would not change the Project Site's General Plan land use designation of Hybrid Industrial, CPIO designation of Jefferson/La Cienega-Expo Line Transit Oriented Development (TOD) subarea, or CM-2D-CPIO zoning. Further, as discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations contained in regional and local plans. While the policies described below were generally not adopted for the purpose of avoiding or mitigating an environmental effect, an analysis of the Project's consistency with these policies has nevertheless been provided below, for informational purposes. Finally, as discussed throughout this SCEA, implementation of the Project would not result in any significant impacts. As such, the Project's impacts with respect to land use and planning would be less than significant.

Land Use Compatibility

The L.A. CEQA Thresholds Guide 2006[90] addresses land use compatibility as it relates to assessing impacts on surrounding land uses. Evaluating the significance of environmental impacts, i.e., physical impacts and changes to the environment, related to compatibility requires more than merely comparing the physical attributes of the proposed building to the physical attributes of buildings adjacent to the Project Site and in the surrounding area. A significant impact is not generated simply because a proposed building is different than some of the buildings or even many of the buildings in the surrounding area. For purposes of evaluating environmental impacts related to compatibility, it is useful to address the functional compatibility of the Proposed Project with its surrounding land uses. Functional compatibility is defined as the capacity for adjacent, yet dissimilar land uses to maintain and provide services, amenities, and/or environmental quality associated with such uses. Potentially significant functional land use compatibility impacts may be generated when a Proposed Project hinders the

90 Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf

functional patterns of use and relationships associated with existing land uses. Patterns of use relate to the interaction and movement of people, goods, and/or information.

The physical compatibility of the Proposed Project with its environs is based on an analysis of proposed uses and improvements and their potential on-site and off-site impacts on traffic, noise, air quality, and aesthetics. These impacts, together with proposed mitigation measures, where applicable, are discussed in their respective sections of this SCEA. As such, this section focuses on the compatibility of the Proposed Project from a functional perspective.

SCAG 2020 RTP/SCS Connect SoCal

SCAG functions as the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, and air quality. The 2020-2045 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Clean Air Act (CAA). As such, the 2020-2045 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2025-2045 timeframe and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The 2020-2045 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development. The 2020-2045 RTP/SCS includes a consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the document, considering the economic and job creation impacts of the direct investment in transportation infrastructure, and also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2020-2045 RTP/SCS provides a blueprint for improving quality of life for residents by providing more 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 22.5 million residents by 2045. **Table IV-15** analyses the Project's consistency with the goals and strategies of Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy).

Table IV-15
Consistency Analysis with Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy

Goals and Strategies	Consistency Assessment
2020-2045 RTP/SCS Goals	
Goal 1: Encourage regional economic prosperity and global competitiveness	**Consistent.** This Goal is directed at SCAG and the City of Los Angeles and therefore does not directly apply to the Project. Nevertheless, the Project would further this Goal by providing new creative office space suitable for tech and innovative uses consistent with the surrounding area, fostering global competitiveness. The Project would also further this goal by providing co-working spaces within some of the residential uses to allow for work-life flexibility. The Project would also provide a variety of housing options affordable for various income levels, including very low income and workforce households, furthering economic prosperity across the City's socioeconomic spectrum.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods	**Consistent.** The Project is in an urbanized area within the City of Los Angeles. The Project would develop multi-family residential and affordable units, office space, and ground floor retail uses within a High Quality Transit Area as defined by SCAG and a transit priority area as defined by SB 743. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Project includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Project encourages a variety of

Goals and Strategies	Consistency Assessment
	transportation options and access and is therefore consistent with this Goal.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system	**Consistent.** The Project would further this Goal. The Project is located immediately adjacent to the Metro E Line and co-locates people and jobs in close proximity to transit, which helps to reduce overall VMT and, as a result, GHG emissions. The Project includes a landscaped plaza connecting the Project directly to the Metro E Line station, thereby enhancing the preservation, security, and resilience of the public transit system. The Project also creates a bicycle path link further enhancing the resilience of the transportation network.
Goal 4: Increase person and goods movement and travel choices within the transportation system	**Consistent.** The Project furthers this Goal by providing a variety of transportation options and access thereto. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Project includes a landscaped plaza connecting the Project directly to the Metro E Line station. The Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking.
Goal 5: Reduce greenhouse gas emissions and improve air quality	**Consistent.** The Project co-locates people and jobs immediately adjacent to a transit station and multiple bus lines, as well as provide bicycle and pedestrian amenities, thereby reducing VMT and, as a result, reducing GHG emissions and improving air quality. The Project will also implement additional transportation demand management strategies to further reduce GHG emissions as part of mitigation measure TR1, including a ride share program and educational materials regarding site-specific transportation options. In addition, the Project will implement a project design feature to increase the project's water and energy efficiency, which will further

Goals and Strategies	Consistency Assessment
	reduce air quality and GHG emissions. The Project would result in criteria air pollutant and GHG emissions during construction and operation. However, as will be set forth in detail in the SCEA, air pollutant emissions would not exceed SCAQMD significance thresholds and the project's GHG emissions would be consistent with SCAG's Connect SoCal Plan and CARB's 2017 Scoping Plan.
Goal 6: Support healthy and equitable communities	**Consistent.** The Project meets this Goal by incorporating sustainable design features creating a healthy community for the residents. The low environmental footprint of the Project also contributes to the overall health of the region by generating fewer GHG emissions and minimizing use of water. Lastly, the Project enhances bicycle infrastructure through bike parking and access to the Expo Line Bike Path and Ballona Creek Bike Path, further contributing to healthy communities. The Project also furthers this Goal by providing affordable housing (to very low income and workforce households) immediately adjacent to jobs, transit, and bicycle, pedestrian, and other outdoor opportunities (Kenneth Hahn State Recreation Area and Baldwin Hills Scenic Overlook State Park located within one mile south of the Project Site), thus creating a more livable community for all income levels.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network	**Consistent.** The Project would be located in proximity to public transit opportunities and would implement a transportation demand management (TDM) program. Further, the Project includes sustainable features to address climate adaptation, such as entirely electric buildings, ENERGY STAR appliances, LED lighting, purchasing green power from the LADWP grid and constructing electric vehicle (EV) parking spaces. The Project will also include short- and long-term bicycle parking spots, a rainwater collection cistern, and landscaping with drought tolerant plants.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel	**Not Applicable.** This strategy calls on SCAG to use new transportation technologies and data-driven solutions to increase travel efficiency. The Proposed Project would advance this Goal with its

Goals and Strategies	Consistency Assessment
	enhancements to the public transit and bicycle network.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	**Consistent.** The Proposed Project would construct 260 multi-family residential units of varying sizes. 22 units would be set aside for low-income residents and 7 for workforce households. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Project includes a landscaped plaza connecting the Project directly to the Metro E Line station. The Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north of the site. As such, the Project would provide residents with immediate access to a multitude of public transit, pedestrian, and bicycling opportunities.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats	**Not Applicable.** This Goal is directed towards SCAG and does not apply to the Project. The Project would not interfere with this Goal as it is not located in an identified "constrained" area such as on agricultural land, open space, or tribal lands.[91]
2020-2045 RTP/SCS Growth Strategies	
Strategy 1: Focus growth near destinations and mobility options	**Consistent.** The Project is consistent with this Strategy in that it adds growth on a site with existing mobility options, including transit and bike and further enhances these options. The Project site is located less than one-quarter mile from the Metro La Cienega/Jefferson light rail station, and less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Project includes a landscaped plaza connecting the Project directly to the Metro E Line station. The Project also includes highly visible and accessible bike access and bike parking from the bike lane and would also connect to the existing bike path along Jefferson Boulevard directly north

91 SCAG Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-03-plan.pdf?1604533568

Goals and Strategies	Consistency Assessment
	of the site and nearby access to the Ballona Creek bike path. The proposed Project would promote access to public open space destinations with Kenneth Hahn State Recreation Area located within one mile south of the Project Site, as well as the Baldwin Hills Scenic Overlook State Park. The Project site is also located within a HQTA and TPA, which are identified by SCAG as areas most suited for implementation of SCAG's growth strategies in part because they provide greater mobility options than non HQTAs and TPAs.
Strategy 2: Promote diverse housing choices.	**Consistent.** The Project would develop 260 multi-family residential units of varying sizes. Furthermore, 22 units would be set aside for low-income residents and 7 for workforce households.
Strategy 3: Leverage technology innovations	**Consistent.** The Project will be designed to be a zero-emission community and includes cutting edge sustainable design features including ENERGY STAR appliances, LED lighting, rainwater collection cistern, and the purchase of 100% green power from the LADWP grid. GHG emissions are categorized into three groups (or scopes). Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.[92] The Project will be designed to reach absolute zero carbon emissions by 2040 for Scope 1, 2 and 3 emissions. The residential and office buildings will be constructed with LEED Gold minimum standards and will meet operational performance ratings, such as FitWel. Therefore, the Project will exceed CalGreen and Title 24 Building Standards.
Strategy 4: Support implementation of sustainability policies	**Consistent.** The Project will be designed to be a zero-emission community and includes cutting edge sustainable design features including ENERGY STAR appliances, LED lighting,

92 Carbon Trust. *Briefing: What are Scope 3 Emissions?* Available online at: https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions#:~:text=Scope%201%20covers%20direct%20emissions,in%20a%20company's%20value%20chain., accessed May 26, 2021.

Goals and Strategies	Consistency Assessment
	rainwater collection cistern, and the purchase of 100% green power from the LADWP grid. GHG emissions are categorized into three groups (or scopes). Scope 1 covers direct emissions from owned or controlled sources. Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling. Scope 3 includes all other indirect emissions within the supply chain or in a company, such as business travel, purchased goods and services, or transportation tied to suppliers and customers.[93] The Project will be designed to reach absolute zero carbon emissions by 2040 for Scope 1, 2 and 3 emissions. The residential and office buildings will be constructed with LEED Gold minimum standards and will meet operational performance ratings, such as FitWel. Therefore, the Project will exceed CalGreen and Title 24 Building Standards.
Strategy 5: Promote a Green Region	**Consistent.** The Project would promote access to public open space with Kenneth Hahn State Recreation Area located within one mile south of the Project site, as well as the Baldwin Hills Scenic Overlook State Park. The Project also includes 34,214 SF of landscaped open space at the ground floor and enhancement of bicycle infrastructure through bike parking and access to the Expo Line Bike Path and Ballona Creek Bike Path, further contributing to healthy, greener communities. Furthermore, the Project will be designed to be zero emissions and incorporates numerous sustainable design features to achieve this Strategy.

Source: SCAG Connect SoCal 2020 – 2045 Regional Transportation Plan/ Sustainable Communities Strategy. Available at: https://scag.ca.gov/read-plan-adopted-final-plan, accessed August 18, 2021.

SCAQMD's Air Quality Management Plan

The Project Site is located within the South Coast Air Basin and within the jurisdiction of SCAQMD. In conjunction with SCAG, SCAQMD is responsible for formulating and

93 Carbon Trust. *Briefing: What are Scope 3 Emissions?* Available online at: https://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions#:~:text=Scope%201%20covers%20direct%20emissions,in%20a%20company's%20value%20chain., accessed May 26, 2021.

implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development. SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS. The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of state and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.[94]

As discussed above under "Air Quality," the Project would be consistent with the AQMP.

City of Los Angeles General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements.

Framework Element

The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the Citywide elements. The Citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land

94 2016 Air Quality Management Plan, Executive Summary; South Coast Air Quality Management District; https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-managementplan/final-2016-aqmp/executive-summary.pdf?sfvrsn=4

use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans. The Project Site is located in the West Adams-Baldwin Hills-Leimert Community Plan Area, discussed below.

As discussed on **Table IV-16**, the Project would be substantially consistent with the Framework Element.

Table IV-16
Framework Element Consistency Analysis

Objectives	Consistency Assessment
Land Use	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial consisting of neighborhood serving amenities such as a high-quality restaurant or neighborhood wine bar. Bringing jobs, housing, and lifestyle amenities to one site and community, immediately adjacent to multiple modes of public transportation, will greatly support the needs of the existing West Adams residents, businesses, and visitors.
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.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743, ideal locations to reduce reliance on vehicle transportation. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Project will also connect to and improve the existing bicycle path along Jefferson Boulevard and locate jobs, housing, and neighborhood serving commercial

Objectives	Consistency Assessment
	amenities in one site, thereby reducing the need for site users and visitors to travel elsewhere for services. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. These location and design features of the Project will greatly reduce vehicle miles traveled and congestion and improve air quality, and the Project is therefore consistent with this Goal.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses immediately adjacent to the La Cienega/Jefferson Metro station and multiple bus routes. The area of the Project Site is a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The area is also designated as a Transit Priority Area in the City of Los Angeles and as a Community Center within the West Adams Community Plan. The Project also will conserve existing neighborhoods by providing additional housing, high quality job opportunities, and commercial amenities, as well as abundant landscaped open space, promoting the overall health and sustainability of the existing West Adams residents.
Objective 3.9: Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor neighborhood serving amenities such as a restaurant or wine bar within a HQTA as defined by SCAG and a transit priority area as defined by SB 743.The area is designated as a Transit Priority Area in the City of Los Angeles and as a Community Center within the West Adams Community Plan. The Project is consistent and compatible with the adjacent neighborhood and will enhance it by providing additional housing, high quality job opportunities, and commercial amenities, as well as abundant landscaped open space. Ground floor amenities such as a high-quality restaurant or wine bar, and the Project

Objectives	Consistency Assessment
	Site's copious landscaped ground floor that is open to the public, will activate the streetscape during the day, and on evenings and weekends, at a location that is currently fenced from public access.
Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.	**Consistent.** The Proposed Project aims to target office tenants such as medium / large content / media companies looking for a presence in heart of LA's entertainment industry. West Adams is the ideal location for this target. Many tech and innovative companies are following the content creation/media/entertainment industry into West Adams and the surrounding neighborhoods, fueling the revitalization of this area of the City. Content/media companies that have established a presence in the area include HBO, Amazon, Apple, and TikTok with new offices and/or studios in Culver City, and Netflix, Google, and Facebook, with West LA offices.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The existing development on the Project Site is a self-storage facility fenced off from general public access. The Proposed Project will replace that with a mixed-use residential and office development that includes thousands of square feet of ground floor, landscaped plaza areas which will be open to the public. The Project also will include other pedestrian-oriented amenities such as bicycle facilities and improvements along the existing bicycle path (including street trees and other landscaping) that would enhance pedestrian activity. The ground floor will also feature neighborhood serving commercial uses such as a restaurant or wine bar that will activate the streetscape on evenings and weekends in an area that is currently fenced off from public access.
Housing	
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency

Objectives	Consistency Assessment
	of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Urban Form and Neighborhood Design	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
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.	**Consistent.** The Proposed Project is located in an area is designated as a Transit Priority Area in the City of Los Angeles and as a Community Center within the West Adams Community Plan. The existing development on the Project Site is a self-storage facility fenced off from general public access. The Proposed Project will replace that with a mixed-use residential and office development that includes thousands of square feet of ground floor, landscaped plaza areas which will be open to the public. The Project also will include other pedestrian-oriented amenities such as bicycle facilities and improvements along the existing bicycle path (including street trees and other landscaping) that would enhance pedestrian activity. The ground floor will also feature neighborhood serving commercial uses such as a restaurant or wine bar that will activate the

Objectives	Consistency Assessment
	streetscape on evenings and weekends in an area that is currently fenced off from public access.

Source: City of Los Angeles General Plan Framework Element.

West Adams-Baldwin Hills-Leimert Community Plan

The Community Plan is one of 35 Community Plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. Together, the plans make up the Land Use Element of the General Plan. The Community Plan is intended to promote an arrangement of land uses, streets, and services, which will encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of Los Angeles and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community.

As discussed on **Table IV-17**, the Project would be consistent with the Community Plan.

Table IV-17
West Adams-Baldwin Hills-Leimert Park Community Plan Consistency Analysis

Goals	Consistency Assessment
Land Use	
Goal LU7: A community that promotes an environment of safe, inviting, secure and high-quality multi-family neighborhoods for all segments of the community.	**Consistent.** The Proposed Project would develop a 260-unit multi-family residential building with designated affordable units (22 low income and 7 workforce housing), which will add a variety of housing opportunities and price points. The Proposed Project will also increase the safety and quality of the neighborhood by activating the streetscape at a site that is currently fenced off from and uninviting to the general public. The Proposed project includes thousands of square feet of ground floor, landscaped plaza areas which will be open to the public, other pedestrian-oriented amenities such as bicycle facilities and improvements along the existing bicycle path (including street trees and other landscaping) that would enhance pedestrian activity, and ground floor neighborhood serving commercial uses such as a restaurant or wine bar that will activate the streetscape on evenings and weekends for existing and future residents.

Goals	Consistency Assessment
Goal LU11: A community where new housing is located in a manner which reduces vehicular trips and makes it accessible to services and facilities.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. These design and location features encourage a variety of non-vehicular transportation options and access, thereby reducing vehicle miles traveled. The Project is therefore consistent with this Goal.
Goal LU12: A community that promotes an ecologically sustainable future by encouraging adherence to accepted principles of "green" building.	**Consistent.** The Project will aim to increase water and energy efficiency with features such as Energy Star appliances, purchasing green power from LADWP, and EV parking which will reduce air quality and GHG emissions. Further, the project co-locates people and jobs immediately adjacent to a transit station thereby reducing VMT and, as a result, GHG emissions. (See Section 3, Air Quality and Section 8, Greenhouse Gas Emissions).
Goal LU14: A community that conserves, enhances and regenerates its distinctive "main street" character by promoting continued pedestrian orientation of commercial areas.	**Consistent.** The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor neighborhood serving uses such as a restaurant or wine bar. The site lies within an area designated as a community commercial center and the project would encourage the activation of pedestrian users by adding thousands of square feet of ground floor, landscaped plazas, improvements along the existing bicycle path, and ground floor dining options that will activate the streetscape.
Goal LU15: A community that prioritizes mixed-use projects within community commercial nodes, centers and transit-oriented development areas.	**Consistent.** The Proposed Project is located in a community commercial area and would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a HQTA as defined by SCAG and a transit priority area as defined by SB 743.

Goals	Consistency Assessment
Goal LU28: A Community where residents will be able to access their daily needs by walking, biking or using other sustainable modes of transportation.	**Consistent.** The Project Site is in an urbanized area within the City of Los Angeles. The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a HQTA as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking by including improvements along the existing bicycle path, ground floor dining options, and thousands of square feet of ground floor, landscaped public plaza space that connects to the directly adjacent Metro station. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.
Mobility	
Goal M3: A community-wide pleasant street environment that is universally accessible, safe, and convenient for pedestrians.	**Consistent.** The Project would encourage streetscape improvements within a transit-oriented area. It would also provide plaza areas that connect with the existing bike path and Metro station to the north of the Project Site.
Goal M4: A safe, comprehensive, and integrated bikeway network that is accessible to all, and encourages bicycling for recreation and transportation.	**Consistent.** The Project would connect to the existing bike pathway and act as a node that provides bicycle access for a transit-oriented community center. The Project would also incorporate bicycle amenities such as 222 bicycle parking spaces.
Goal M5: An integrated land use and transit strategy that directs growth to areas that are accessible by transit facilities and services.	**Consistent.** The Proposed Project would develop multi-family residential and affordable units, office space, and ground floor commercial uses within a High Quality Transit Area (HQTA) as defined by SCAG and a transit priority area as defined by SB 743. The Project Site is located less than one-quarter mile from the Metro La Cienega/Jefferson station. Furthermore, the site is located less than one-half mile from Metro bus lines with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. The Proposed Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access.

Source: City of Los Angeles West Adams-Baldwin Hills-Leimert Park Community Plan.

West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (CPIO)

The West Adams CPIO District contains seven Subareas, which are parcels characterized by common overarching Community Plan themes, goals, and policies, and are grouped by a common boundary. The Project Site is located within the Jefferson/La Cienega TOD Subarea. This Subarea identifies specific blocks surrounding the La Cienega/Jefferson Metro Station and provides specific use limitations, development standards, and streetscape guidelines for projects to facilitate TOD. This Subarea identifies parcels where a range of development heights and intensities are permitted. The Jefferson/La Cienega TOD Subarea advances the creation of an employment destination outside of the City Center where a mix of uses that feature emerging and innovative commercial, office, "cleantech," "information technology," and other "high tech" uses can locate in proximity to existing and future residences within a medium to high intensity transit hub.

As discussed on **Table IV-18**, the Project would be consistent with the standards provided for the Jefferson/La Cienega TOD Subarea. The Proposed Project lies within Parcel Group B of the Jefferson/La Cienega TOD Subarea.

Table IV-18
Jefferson / La Cienega TOD Subarea Consistency Analysis

Development Standard	Consistency Assessment
Building Height: 75 feet for Parcel Group B.	**Not Applicable.** Pursuant to Government Code Section 65915 and LAMC Section 12.22-A.25, the Project Entitlements include a DBL Off-Menu Incentive to construct a residential building up to 149'-6" tall and a commercial building up to 92' tall. The DBL renders the CPIO's 75' height standard inapplicable to the Project. (See *Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329, 1347.) Because the CPIO's height standard does not apply to the Project, the Project's height is not inconsistent with the CPIO for CEQA purposes. (*Ibid*.)
Building Intensity and Density: A Floor Area Ratio (FAR) of 3:1.	**Consistent.** The Proposed Project would have an FAR of 3:1 and be consistent with this development standard.
Building Disposition: A minimum lot coverage of 30%.	**Consistent.** The Proposed Project would comply with this development standard.

Development Standard	Consistency Assessment
Building Design: Frontages and pedestrian oriented ground floor.	**Consistent.** The Proposed Project would have pedestrian ordinated plaza areas and ground floor retail uses.
Parking: The maximum amount of parking that is allowed for buildings directly adjacent to or across the street from the Mass Transit Station shall be 50% of the parking required in the LAMC for the underlying zone district.	**Not Applicable.** Pursuant to Government Code Section 65915 and LAMC Section 12.22-A.25, the Project Entitlements include a DBL Off-Menu Incentive to waive the CPIO restriction on parking stalls in order to construct up to 785 parking spaces, 413 of which are to be unassigned. The DBL renders the CPIO's parking limitation inapplicable to the Project. (See *Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329, 1347.) Because the CPIO's parking limitation does not apply to the Project, the Project's parking count is not inconsistent with the CPIO for CEQA purposes. (*Ibid*.)

Source: City of Los Angeles West Adams-Baldwin Hills-Leimert Park Community Plan Implementation Overlay District.

The Project includes construction of two buildings and other site improvements that are compatible with the scale and character of the adjacent properties and the surrounding neighborhood. The immediate vicinity has been home to many new developments within the past years, particularly to the north, west, and southwest of the Project Site. Located north of the Project Site (across the Metro E Line) is the nearly completed "Cumulus Project" which is improved with nearly 1,200+ residential units and up to 300,000 sf of commercial, office and retail uses with a 320' tower. Southwest of the Project Site is the recently approved "Samitaur" building (5850 W. Jefferson Blvd.) which will include an approximately 344,947 sf office building that is 320 feet (22 stories) in height and provides 908 vehicular parking spaces, far denser and taller and with more parking than the Project. West of the Project, currently under construction, is the "(W)rapper" tower (5790 W. Jefferson Blvd.), a 230-foot-tall structure containing approximately 180,00 sf of office and ground floor retail. Further west is the content creation/media/entertainment hub of the Hayden Tract and Culver City. To the east, southeast, and northeast of the Property are existing single and multi-family neighborhoods, consistent with the Project's multifamily use. While the immediate area lacks a consistent development pattern, architectural style, and land uses, and buildings in the area are built to a variety of heights, setbacks, and massing, the Project's design, height, setbacks, massing and uses will be entirely compatible with and fall well within the building and use envelopes of these surrounding uses. These surrounding uses also demonstrate a consistent trend of an ongoing transformation of this major corridor and West Adams community from low-

impact, sprawling light industrial and commercial uses to a denser, transit-oriented mixed-use area consisting of creative office, digital and media-centered businesses, retail, and residential uses. The Project's design and uses coincide with this trend and will improve the community's future by bringing high quality job opportunities, a mix of rental options available for varying income levels, and residential-serving retail. The Project's articulated ground floor, open space, building design, abundant landscaping, and other features will also activate the ground level and improve the walkability, bikeability, and accessibility to public transit of this neighborhood.

As noted above and in **Table IV-18**, the Project complies with all applicable zoning, land use designations, and development standards of the CPIO and LAMC. As noted in **Table IV-18**, the Project's height and parking stall count exceeds the CPIO's height and parking limitations. The Project, however, is not inconsistent with these standards because the Project's height and parking stall count are development incentives that will obtained through the DBL, which renders those CPIO standards inapplicable to the Project. (*Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329, 1347 [finding that DBL rendered base development standards, which were modified by the DBL, inapplicable to project and thus project's inconsistency with such standards did not constitute inconsistency with applicable development standards for CEQA purposes].)

With respect to building design and pedestrian orientation, the majority of parking spaces would be provided in two subterranean parking levels, allowing for the generous landscaping and open spaces proposed. Key pedestrian-oriented components of the Project include:

- The Crossings Transit Plaza: A public gateway space located on the northeast corner of the Project Site that creates a threshold and welcoming entrance to the site.

- Cienega Square: At the heart of the Project Site between the two buildings and stretching parallel to the existing bike lane running along the northern edge of the Project Site. This area enhances the cyclist and pedestrian experience with opportunities for bike / running / fitness infrastructure, landscape and public art and leverages the adjacency to the bike path along the north end of the site.

- Bike access and bike parking that is highly visible and accessible from the bike lane and other public open spaces.

The Project not only provides for uses, buildings, structures, open spaces, and other improvements that are compatible with the scale and character of the adjacent properties

and the surrounding neighborhood but would also enhance the surrounding neighborhood. Therefore, the Project would be compatible with the surrounding area and impacts would be less than significant.

12. Mineral Resources

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is a well-developed, built out section of the West Adams community near a metro-transit stop and is designated as Hybrid Industrial zoning. The Conservation Element of the LA General Plan notes that the State Mining and Reclamation Act (SMARA) ensures against premature loss of minerals and protects sites threatened by development practices which might preclude future mineral extraction.[95] The Project Site has not previously been used for mineral extraction and is not located within an oil drilling district, state-designated oil field or surface mining district, and there are no active mining operations on the Project Site or near the project vicinity.[96] State designated oil fields are located within the central western and northeastern portions of the West Adams – Baldwin Hills -Leimert Community Plan Area.[97]

The Project Site is not within a Mineral Resource Zone (MRZ-2) - areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.[98] Further, the Project is located in the Jefferson/La Cienega TOD Subarea, which is not an area of known mineral resources. The Project Site is currently zoned CM-2D-CPIO, and the Project does not propose any changes to the zoning or to the existing Hybrid Industrial land use designation. Thus, the Project Site is not zoned for oil extraction and drilling, or mining of mineral resources, and there are no such sites at the Project Site.

95 City of Los Angeles *General Plan*, "Conservation Element" (2001), *Mineral Resources Exhibit A*, January 2001, https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf.

96 Ibid.

97 California Department of Conservation. CalGEM GIS. Available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.36866/34.01876/14, accessed August 20, 2021.

98 California Department of Conservation (2001); ESRI Streetmap USA (2008); Alta Planning + Design (2011)

Therefore, no impacts would occur to known mineral resources.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. As stated above, the proposed development is not located within an MRZ-2 Area and is not zoned for oil extraction or drilling. The Project Site is not identified as an important mineral resource recovery site on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

13. Noise

The following information is from the Noise and Vibration Technical Assessment conducted in July of 2021, found in **Appendix C**, which describes the existing noise and vibration environment of the Proposed Project, and evaluates potential impacts from its construction and operation.

a. Will the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☒	☐	☐

Less than Significant with Mitigation Incorporated. Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also

considered noise-sensitive land uses. Noise-sensitive receptors surrounding the Project Site include residential dwellings to the southeast across La Cienega Boulevard, the historic See's Candies building located immediately south of the Project Site, media and other potentially noise sensitive uses to the west and south of the Project Site, and more residential units to the northeast across the intersection of La Cienega Boulevard and Jefferson Boulevard.

Existing Ambient Noise Levels

The Project Site currently contains a self-storage facility. Noise is generally limited to auto-related activities, such as tire squeals, slamming vehicle doors, and vehicle travel. A noise monitoring survey was completed to establish existing noise levels in the vicinity of the Project Site. Transportation noise is the main source of noise in urban environments, largely from the operation of internal combustion engines and frictional contact between vehicles and ground and air.[99]

Noise measurements were conducted on the Project Site and in the project vicinity (**Figure IV-2, Noise Monitoring Locations**). Four short-term measurements were conducted with a Larson Davis SoundTrack LxT1 sound level meter placed on a tripod with the microphone positioned approximately 5 feet above the ground. Ambient sound levels were generated dominated by street traffic noise. **Table IV-19** presents the result of the ambient, short-term noise measurements. It should be noted that due to the ongoing Coronavirus pandemic, traffic volumes on local roads are likely lower than usual. Therefore, noise measurements that were conducted in February 2021 are likely lower than pre-pandemic conditions and therefore conservative measurements for the existing noise environment.

99 World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed July 2, 2020.

SOURCE: Google Earth, 2021

FIGURE **IV-2**

IMPACT SCIENCES

Noise Monitoring Locations

1346.001•05/2021

Table IV-19
Ambient, Short-Term Noise Measurements

Modeled Noise Measurement Location #	Street Address	dBA Leq
Location #1	5785 Corbett Street (residences)	73.6
Location #2	3431 S. La Cienega Boulevard (See's Candies)	63.0
Location #3	5760 W. Jefferson Boulevard (media company and offices)	63.5
Location #4	5673 W. Jefferson Boulevard (residences)	68.5

Based on the results of the ambient noise measurements and field observations, it was determined that transportation related noise sources are the primary contributor to the noise environment in each of the monitoring locations.

Construction Impacts

During all construction phases, noise-generating activities could 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-site activities could include the use of heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Off-site secondary noises could be generated by sources such as construction worker vehicles, vendor deliveries, and haul trucks.

Noises from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities may include excavators, bulldozers, front-end loaders, graders, backhoes, and scrapers.

As shown on **Table IV-20, Construction Noise Impacts at Off-Site Sensitive Receptors (Unmitigated)**, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously could increase noise by up to approximately 0.7 dBA L_{eq} at the closest residences on Corbett Street to the southeast of the Project Site. Construction noise impacts could cause an increase of up to approximately 14.6 dBA at the historic See's Candies directly south of the Project Site and up to 14.1 dBA at the offices to the west of the Project Site.

Table IV-20
Construction Noise Impacts at Off-Site Sensitive Receptors (Unmitigated)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Location #1 – Residences at 5785 Corbett Street	66.0	73.6	74.3	0.7	No
Location #2 – See's Candies at 3431 S. La Cienega Boulevard	77.4	63.0	77.6	14.6	**Yes**
Location #3 – Offices at 5760 W. Jefferson Boulevard	77.4	63.5	77.6	14.1	**Yes**
Location #4 – Residences at 5673 W. Jefferson Blvd	57.5	68.5	68.8	0.3	No

Source: Impact Sciences, 2021.

These estimated construction noise levels would exceed the City's significance threshold of 5 dBA for the nearest office receptors and the See's Candies building which is considered a historic resource for purposes of this analysis.[100]

However, **Mitigation Measure NOI-1** would require the use of mufflers, sound barriers, or other suitable noise reduction devices capable of achieving attenuation of at least 13 dBA along the Project's southern and western boundaries.

Mitigation Measures

MM NOI-1: During the construction phase, along the southern and western property line, the Proposed Project shall employ construction control measures to reduce increases in ambient noise at the closest receptors by a minimum of 13 decibel Leq. Examples of employable measures include use of mufflers, sound barriers and reducing the time construction equipment is used, as well as ensuring equipment is turned off when not in use. This specification shall be included on all construction documents to ensure compliance.

[100] Los Angeles Department of City Planning, Office of Historic Resources. Supplemental Historic Resources Report: Industrial Zone Properties in the West Adams – Baldwin Hills – Leimert Community Plan Area. Available at: https://planning.lacity.org/odocument/70187c01-923b-44b6-a6d9-b5e1b915c4ce/SurveyLAWestAdamsBaldwinHillsLeimert_IndustrialReport_0.pdf, accessed May 20, 2021

As shown in **Table IV-21, Construction Impacts at Off-Site Sensitive Receptors (with Mitigation)**, implementation of Mitigation Measures NOI-1 would reduce noise exposure of sensitive receptors to below the 5 dBA threshold. As a result, construction noise impacts would be considered less than significant with mitigation.

Table IV-21
Construction Noise Impacts at Off-Site Sensitive Receptors (with Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
Location #1 – Residences at 5785 Corbett Street	63.0	73.6	74.0	0.4	No
Location #2 – See's Candies at 3431 S. La Cienega Boulevard	64.4	63.0	66.8	3.8	No
Location #3 – Offices at 5760 W. Jefferson Boulevard	64.4	63.5	67.0	3.5	No
Location #4 – Residences at 5673 W. Jefferson Blvd	54.5	68.5	68.7	0.2	No

Source: Impact Sciences, 2021.

Temporary Off-Site Construction Activity Noise

Construction haul trucks would generate noise off-site during site demolition and would peak during grading. This would include removal of materials from the Project Site, base materials, and demolished materials. While this vehicle activity would increase ambient noise levels along the haul route, ambient noise levels would not be expected to significantly increase ambient noise levels by 3 dBA or greater at any noise sensitive land use. Studies have shown that a 3 dBA increase in sound level pressure is barely detectable by the human ear. 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.[101] While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses. During the grading phase, the Proposed Project would require approximately 209 haul truck trips (both to and from the project) per day. Because haul trucks generate more noise than

[101] California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Protocol.* September 2013.

traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.[102] Therefore, there would be an addition of 9,992 PCE trips due to haul truck activity during the grading phase. 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.

Traffic volumes in the project area were obtained from the Los Angeles Department of Transportation (DOT) traffic count information.[103] The DOT Traffic Count shows that La Cienega Boulevard has a daily traffic volume of approximately 23,873 vehicles.[104] The addition of 3,152 PCE trips due to the addition of haul trucks during the grading phase would account for approximately 16.7% of existing traffic volume.

Though the addition of haul trucks would alter the fleet mix of vehicles along the potential haul route on La Cienega Boulevard, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let alone augment their traffic to levels capable of producing 5 dBA ambient noise increases. As a result, off-site construction noise impacts related to haul trips would be considered less than significant.

Operational Impacts

As discussed above, 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. Furthermore, a 3 dBA noise level increase is the minimum noise level increase required for a human to perceive a change in ambient noise.

Traffic volumes in the Project area were obtained from DOT traffic count information.[105] Trip generation information for the Proposed Project was added to average daily traffic volumes for La Cienega Boulevard at the intersection of Jefferson Boulevard to determine whether traffic increased enough to result in an audible noise level increase. The DOT Traffic Count data shows that La Cienega Boulevard has a daily traffic volume of approximately 23,873 vehicles.[106] The Project's estimated maximum addition of approximately 3,061 daily vehicle trips would account for approximately 12.8% of the average daily traffic volume for just La Cienega Boulevard alone. This volume is not nearly

102 Caltrans, Technical Noise Supplement Table 3-3, 2013.

103 City of Los Angeles Department of Transportation, *Manual Traffic Count Summary*. May 2017. Available at: https://navigatela.lacity.org/dot/traffic_data/manual_counts/4401_JEFLAC170523.pdf

104 Ibid.

105 City of Los Angeles Department of Transportation, *Manual Traffic Count Summary*. May 2017. Available at: https://navigatela.lacity.org/dot/traffic_data/manual_counts/4401_JEFLAC170523.pdf

106 Ibid.

the doubling of traffic volume required for a 3 dBA increase in noise. This increase in traffic volumes compared to current traffic counts is not significant enough to cause an audible increase in traffic noise and impacts would be less than significant.

LAMC Sec. 112.02 regulates noise from stationary sources such as HVAC systems, requiring that noise from these sources do not cause the noise level on any other occupied property to exceed the ambient noise level by more than five decibels. Regulatory compliance with LAMC Sec. 112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL to or within their respective L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" noise categories, or by 5 dBA or greater overall.

Parking noise typically generates noise levels of approximately 60 dB(A) at 50 feet. However, parking from the project would occur in a three-level underground structure. Noises from the Project's underground parking level would be inaudible, shielded from nearby receptors. These parking noises would not exceed the normally acceptable level of noise identified for adjacent land uses. Therefore, parking noise would result in a less than significant impact.

b. Would the project generate excessive groundborne vibration or groundborne noise levels?

☐ ☐ ☒ ☐

Less than Significant. The Federal Transit Administration (FTA) provides ground-born vibration impact criteria with respect to building damage during construction activities. Peak Particle Velocity (PPV), expressed in inches per second, is used to measure building vibration damage. Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[107] The FTA Transit Noise and Vibration Impact Assessment Manual also

[107] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

includes vibration thresholds based on land use categories, expressed as vibration decibels (VdB).

Groundborne vibration generated by construction activities associated with the Proposed Project would affect both on- and off-site sensitive uses located in close proximity to the Project Site. As shown in **Table IV-22, Vibration Source Levels for Construction Equipment**, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels (VdB) ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table IV-22
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.000 8	0.000 6	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

Table IV-23, Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated, shows the vibration velocity and levels that would occur at these nearby buildings and structures during construction at the Project Site. It should be noted that while the See's Candies building is considered historical for purposes of this analysis it has not been officially designated as such and it is still in use for as a manufacturing facility today and all receptors are thus evaluated as non-engineered timber and masonry buildings.

Table IV-23
Vibration Levels at Off-Site Sensitive Uses from Project Construction - Unmitigated

Sensitive Uses Off-Site	Distance to Project Site (ft.)	Receptor Significance Threshold PPV (in./sec)	Estimated PPV (in/sec) [a]
Location #1 - 5785 Corbett Street	185	0.2	0.004
Location #2 – 3431 S, La Cienega Boulevard (See's Candies)	15	0.2	0.191
Location #3 - 5760 W. Jefferson Boulevard	15	0.2	0.191
Location #4 - 5673 W. Jefferson Boulevard	350	0.2	0.002

Source: Impact Sciences, Inc. 2020

The vibration velocities predicted to occur at Location #2 and #3, the nearest receptor located 15 feet from the nearest project site boundary would be 0.191 in/sec PPV. All receptors are evaluated as non-engineered timber or masonry buildings to account for the most sensitive building types and would not experience a PPV groundborne vibration level that exceed the FTA 0.2 in/sec PPV threshold.

Furthermore, since the See's Candies building is considered a potential historic building, the Proposed Project would implement Mitigation Measure N2 from the West Adams-Baldwin Hills – Leimert Community Plan EIR as a Condition of Approval. This would require the preparation of a Vibration Control Plan that would be approved by the City (See **Table III-3, West Adams- Baldwin Hills – Leimert Community Plan Applicable Mitigation Measures**). Therefore, vibration impacts associated with building damage due to construction activities would result in a less than significant impact. No mitigation is required.

The Project area has several recording studios that could be sensitive to vibration due to the need to specialized equipment and precise volumes. The FTA Transit Noise and Vibration Impact Assessment Manual also includes vibration thresholds based on land use categories. For buildings with sensitive interior operations such as recording studios the FTA recommends a threshold of 65 VdB.[108] The nearest receptor with potentially sensitive interior operations would be the Eastham Drive Studios located approximately 630 feet west of the Project Site. At this distance, the unmitigated vibration levels from

[108] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual. September* 2018.

construction equipment would generate vibration levels of 45 VdB at the Eastham Drive Studios. This would be well below the threshold for recording studio uses and impacts would be less than significant. No mitigation is required.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is not in the vicinity of a private airstrip or airport land use plan. Likewise, the Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest public airport would be Santa Monica Airport, which is located over 4 miles to the west of the Project Site. As such, the Project would not expose people residing or working in the Project area to excessive airport-related noise levels. No impact would occur from the Proposed Project and no further analysis is required.

14. Population and Housing

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)?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than significant. The Proposed Project involves development of a mixed-use project proximate to a transit station. The Proposed Project does not propose any changes to the zoning or land use designation for the Project Site (see **Section 11, Land Use**, of this document).

The population within the West Adams Baldwin Hills- Leimert CPA is approximately 174,168.[109] The population within the CPA is anticipated to grow to 214,012 by 2030.[110] The Proposed Project, which would increase local population by 744 residents and 1,284 employees, is consistent with the land use designation and development density prepared in the City of Los Angeles' General Plan, specifically the growth projections for the West Adams – Baldwin Hills – Leimert Community Plan. The increase of 744 residents would account for less than 2% of the anticipated growth in population, and that is assuming all residents would be new to the area and would not relocate from with the CPA itself.

Further, as provided in Section III SCEA Eligibility, a qualifying TPP is a project that is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG Connect SoCal 2020-2045 RTP/SCS. On May 7, 2020, the SCAG Regional Council approved the Connect SoCal 2020-2045 RTP/SCS for conformity purposes only. On September 3, 2020, the Regional Council formally adopted the Connect SoCal 2020-2045 RTP/SCS in its entirety to provide a roadmap to expand transportation options, improve air quality, and bolster Southern California's long-term economic viability. On October 30, 2020, CARB accepted, via CARB Executive Order G-20-239, SCAG's determination that Connect SoCal would, if implemented, achieve the applicable GHG emissions reduction targets established by CARB for the region.

The Project Site, which is within one-half mile from a major transit stop since it is adjacent to the La Cienega / Jefferson Metro Station, is in an area that is considered by SCAG as a Priority Growth Area (PGA).[111] PGAs include Jobs Centers, Transit Priority Areas (TPA), High Quality Transit Areas (HQTA), Neighborhood Mobility Areas, and Livable Corridors, among other areas. SCAG identifies these areas as most suited for implementation of SCAG's growth strategies. If implemented, PGAs are expected to accommodate 64% of forecasted household growth and 74% of forecasted employment growth between 2016 and 2045.

The Proposed Project would also be consistent with the land use patterns promoted by the 2020-2045 RTP/SCS Forecasted Regional Development Pattern, as shown in **Table III-1**. SCAG's SCS is built on a "bottom up" land use approach with engagement from

[109] City of Los Angeles Department of City Planning. 2017. West Adams-Baldwin Hills-Leimert Demographic Profile. Available at: https://planning.lacity.org/odocument/ec32903f-791b-4351-a7c9-d347939282ca/2017_demo_profile_west_adam.pdf, accessed September 23, 2021.

[110] City of Los Angeles Department of City Planning. 2016. West Adams-Baldwin Hills-Leimert Community Plan. Available at: https://planning.lacity.org/odocument/78984e0b-a63d-4533-ba57-4f84b8fd7696/West_Adams-Baldwin_Hills-Leimert_Community_Plan.pdf, accessed September 23, 2021.

[111] Southern California Association of Governments. 2021. Priority Growth Areas (PGA) – SCAG Region. Available at: https://hub.arcgis.com/datasets/0da9bc5fba2d4b409c8f166166bf8888_6/explore?location=33.931017%2C-117.128018%2C8.14, accessed August 17, 2021.

local jurisdictions, meaning the overall uses are developed in coordination with local jurisdictions. Projects that are generally consistent with the general plan land use (or community or specific plan) would therefore be consistent with SCAG's use designations, including density and intensity, as the local plan informs the SCS. As discussed in **Section II, Project Description**, the Proposed Project complies with the zoning, land use designations, and development standards of the General Plan, West Adams – Baldwin Hills – Leimert Community Plan Implementation Overlay, and City's Municipal Code, including density and building intensity, except for those standards modified by the DBL. (*Wollmer v. City of Berkeley*, 193 Cal.App.4th 1329, 1347 [finding that DBL rendered base development standards, which were modified by the DBL, inapplicable to project and thus project's inconsistency with such standards did not constitute inconsistency with applicable development standards for CEQA purposes].)

Therefore, the Proposed Project is consistent with the growth anticipated and accommodated by the City's General Plan and SCAG's Connect SoCal and in fact, furthers many of the City and region's goals related to placement of housing and jobs in areas accessible to established high-quality transit. Furthermore, the Project is located in a developed urban area with an established roadway and transit network and in-place infrastructure. Thus, development of the Proposed Project would not require extending or improving infrastructure in a manner that would facilitate off-site growth. Therefore, the Proposed Project would not induce substantial unplanned population growth. 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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site does not contain any existing dwelling units. Therefore, the Proposed Project would not displace any residents or housing and would have no related impacts.

15. Public Services

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause

significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire Protection?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A development project would have a significant impact on fire protection if it requires a new or expanded fire station to maintain service and that new or expanded facility resulted in adverse physical effects.

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

To comply with California Department of Industrial Relations (Cal-OSHA) and State and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[112] Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and State regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations.

[112] https://www.dir.ca.gov/title8/1920.html.

These impacts, while potentially adverse, would be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General "good housekeeping" procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are also addressed through a Construction Traffic Management Plan (CTMP), which includes traffic management strategies for Project construction. The CTMP, which is required by Los Angeles Department of Transportation (LADOT) would outline and dictate how construction operations would be carried out and would identify specific actions to reduce effects on the surrounding community.[113] The CTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity. In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. It is acknowledged that, even with the CTMP, the Project could incrementally increase traffic, which could potentially delay emergency response times. However, the Project's potential impacts are minimal given these other factors.

The City of Los Angeles Fire Department (LAFD) is equipped and prepared to deal with construction-related traffic and fires should they occur. LAFD reviews new construction, change of use, and remodeling projects for buildings and structures containing State Fire Marshal occupancy. Plans are reviewed for compliance with national, state, and city codes and standards. Fire/Life safety systems such as fire alarm and two-way radio communication for all buildings and occupancies are reviewed.[114] Additionally, compliance with applicable City Building Code and Fire Code requirements would be

[113] LLG Engineers, Transportation Assessment Report 3402 South La Cienega Boulevard Project, September 2021
[114] Los Angeles Fire Department Fire Life Safety Plan Review. https://www.lafd.org/fire-life-safety-plan-review

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. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD prior to the approval of a building permit. The plot plan shall include the following minimum design features; fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site.

Due to the limited duration of construction activities and compliance with applicable codes, Proposed Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, impacts on fire protection services associated with construction of the Project would be less than significant.

Operation

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (Plan Check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Site would be adequate, and the associated impact would be less than significant.

Response Distance

LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion along the response route. Section 903 of the 2020 Los Angeles Fire Code outlines the requirements for automatic sprinkler systems in residential dwelling units, based in part on a maximum response distance from

the land use proposed (1.5 miles in the case of the Project).[115] LAFD considers fire protection services for a project adequate if a project is within the maximum response distance. The site location is served by LAFD Fire Station 94, located at 4470 Coliseum Street, about 1.7 miles from the Project Site.[116] Therefore, because the site location exceeds the maximum response distance of 1.5 miles between residential land uses and a LAFD fire station that houses an engine or truck company, the applicant must install fire sprinklers in the residential building.

Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the incorporation of fire sprinklers and other fire protection systems within the proposed building, Project impacts related to response distance would be less than significant.

Emergency Access

The LAFD would review Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. As required by applicable codes and regulations, the Proposed Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Residents and visitors would all be informed of emergency procedures in accordance with applicable codes and regulations. The Proposed Project is being designed to also comply with applicable LAFD requirements as it relates to the internal roadway system. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Conclusion

Consistent with the ruling of City of *Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 and the requirements stated in the California

115 Los Angeles Fire Code. Section 901. Available at: https://codes.iccsafe.org/content/CACLAFC2020P1/chapter-9-fire-protection-and-life-safety-systems#CACLAFC2020P1_Pt03_Ch09_Sec903

116 Los Angeles Fire Department, Find My Station, accessed on February 18, 2021, https://www.lafd.org/fire-stations/station-results.

Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.[117] Further analysis, including a specific location, would be speculative and beyond the scope of this document. Thus, the Project impacts on fire protection and emergency medical services would be less than significant.

ii. Police protection?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project Site is served by the Los Angeles Police Department (LAPD) District 321 of the Southwest Division[118], which services the West Adams, Leimert Park, and Jefferson Park communities.[119] The station is located on 1546 West Martin Luther King Jr. Boulevard, about four miles from the proposed Project.

Construction

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

[117] Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. See, Notice of Determination for Van Nuys Fire Station 39, at http://eng2.lacity.org/techdocs/emg/docs/vannuys_fs39/NOD_160701.pdf

[118] Los Angeles ZIMAS, accessed February 18, 2021, http://zimas.lacity.org/.

[119] Los Angeles Police Department, Southwest Community Police Station, https://www.lapdonline.org/southwest_community_police_station.

temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut.

Construction activities also have the potential to affect police response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. In accordance with LADOT requirements, a CTMP would be prepared if the public right of way would be affected by Project construction. If temporary street, lane, and sidewalk closures will be needed for the duration of 72 hours or longer a B-Permit is required from the BSS. Through this review and permit process LADOT ensures compliance with federal and State principles and standards and the safe and efficient movement through and around construction zones. Therefore, impacts to police protection response time during Project construction would be less than significant.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
- Construction impacts are temporary in nature and do not cause lasting effects; and
- Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance

objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant

Operation

The Project Site is currently developed with a self-storage facility. The existing minimally used site would be replaced with a vibrant development that would generate more people on the site most of the day, as well as activation of the street and connection with the bike path, potentially increasing the overall safety of the Project Site. However, it is possible that the increase of on-site residents, visitors, patrons, and employees to the Project Site, could generate a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and nonvisible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. The Project would also include security cameras for the residential and commercial components. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. These features will be developed with Los Angeles Police and Fire through their review of the Proposed Project.

Finally, as required the Proposed Project would incorporate Mitigation Measure PS1 from the West Adams – Baldwin Hills -Leimert CPA EIR as a condition of approval, which would ensure that the Project incorporates all crime prevention features recommended by the LAPD. The provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Moreover, consistent with City of *Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, Proposed Project impacts related to police protection services would be less than significant.

iii. Schools?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project Site is served by the Los Angeles Unified School District (LAUSD). A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for school facilities which would exceed the capacity of LAUSD. Whether a project results in a significant impact on public schools is made with the following considerations:

1. Population increases resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area;

2. Demand for school services anticipated at the time of project completion and occupancy compared to the expected level of service available, considering, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;

3. Whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s); and

4. Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by one elementary school, one middle school, and one high school that is part of the LAUSD system.[120] Baldwin Hills Elementary School serves kindergarten through fifth grade and is located at 5421 Rodeo Road, about 1.25 miles from the Project Site. Audubon Middle School serves sixth through eighth grade, and is located at 4120 11th Avenue, 2.72 miles from the Project Site. Finally, Susan Miller Dorsey Senior High School serves ninth through twelfth grades and is located at 3537 Farmdale Avenue, 1.5 miles from the Project Site. All three schools are within a 10-minute drive to the Project Site. The Proposed Project consists of 260 residential apartment units.

[120] Resident School Identifier, Los Angeles Unified School District, accessed on February 22, 2021, https://rsi.lausd.net/ResidentSchoolIdentifier/.

LAUSD uses student generation factors to determine student projections. Using the most recent LAUSD student generation factor of 0.437 students per household, the Project would potentially generate up to 113 students. The current enrollment at the above three schools is approximately 1,740 students.[121] The capacity for the three schools is 616 students for Baldwin Hills Elementary School, 2,400 students for Audubon Middle School, and 2,320 students for Susan Miller Dorsey Senior High School.[122] The Proposed Projects generation of students would not increase the number of students beyond the current capacities at either of these schools, even when assuming all students would be coming from different schools as opposed to relocating within the same area.

Pursuant to the California Government Code Section 65995, the Project Applicant would be required to pay school fees established by LAUSD, payment of which in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

iv. Parks?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A Project could result in a significant impact on local parks if the population increase as a result of the development disproportionally increases or reduces the demand for recreation and park services. The Proposed Project is located approximately a quarter mile from the nearest Los Angeles City park, Westside Neighborhood Park.[123] The Rancho Cienega Recreation Center is located about 1.27 miles away and is a sports center with a gymnasium, community room, pool, and adjacent stadium.[124] The Proposed Project is expected to generate approximately 744 residents based on 260 residential units,[125] and may result in a proportional increase in the use of

[121] Los Angeles Unified School District. LAUSD Open Data. Available at: https://my.lausd.net/opendata/dashboard, accessed September 23, 2021.

[122] City of Los Angeles. 2006. L.A. CEQA Thresholds Guide. Available at: https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf, accessed on September 23, 2021.

[123] Syd Kronenthal Park, part of adjacent Culver City, is one third of a mile away from the Project location.

[124] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator, accessed February 2021.

[125] Estimated population based on CalEEMod modeling, see Air Quality and Greenhouse Gas Technical Report.

the local community parks as well as regional parks (including Baldwin Hills Scenic Overlook and Kenneth Hahn State Recreation Area).

The demand for parks and recreational facilities in the City is generally determined based on the number of residents a project would generate and the City's parkland acreage-to-population ratios are based on residential population and not employee population. The Proposed Project would be required to comply with Los Angeles Municipal Code Section 12.33, which requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents,[126] with an exception made for affordable housing units. These fees are used to fund land acquisition and capital improvements. Furthermore, the proximity to the La Cienega/Jefferson Station would connect residents to various recreational areas in the City and County, such as access to beach cities and other regional recreational areas.

The Proposed Project would include open space areas which would be required per LAMC 12.21-G. Per City requirements, the required Useable Open Space (an area which is designed and intended to be used for active or passive recreation) would be 28,925 square feet. This requirement will be fulfilled by both common open space areas and private open space areas as defined by LAMC 12.21-G. The Proposed Project would include 22,836 square feet of additional exterior common open space beyond what is required by LAMC 12.21-G. As part of the required 28,925 square feet, the Project also would include 7,032 square feet of planted common open space, which is equivalent to 25% of the Project's Common Open Space. As such, all LAMC 12.21-G requirements regarding open space for new residents' units would be met.

It is estimated that development of the Proposed Project would result in an increase of approximately 744 new residents, and that these residents would increase the activity and frequency of use of these facilities. The Proposed Project includes on-site open space amenities intended to serve the recreational needs of on-site residents, including an outdoor wellness garden, connection to the existing bike path adjacent to the northern edge of the Project Site, an outdoor barbeque lounge, a swimming pool and an approximately 1,700 square foot indoor fitness facility. However, it is assumed the future residents of the Project Site would use recreation and park facilities in the surrounding area and generate additional demand for such amenities. Based on the standard parkland ratio goal of two acres per 1,000 residents, the Proposed Project would generate a need for approximately one acre of public parkland. This demand would be met through a

[126] Board Report No. 17-120, Board of Recreation and Park Commissioners, Approved May 17, 2017, https://www.laparks.org/sites/default/files/pdf/commissioner/2017/may17/17-120.pdf.

combination of (1) on-site open space proposed within the Project discussed above, and (2) payment of applicable fees regarding the availability of existing park and recreation facilities within the area. Los Angeles Municipal Code Section 12.33 requires all new, non-exempt, residential dwelling units to dedicate land, pay a fee or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding and improving park and recreational facilities for new residents, with an exception made for affordable housing units. Therefore, due to the Project's open space and amenities, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks and impacts of the Project would be less than significant. Impacts related to parks and recreational facilities would be less than significant.

v. Other public facilities?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Libraries

Less than Significant Impact. A significant impact could occur if a project includes substantial employment or population growth whose demand would exceed the capacity available to serve the Project Site.

Library facilities within two miles of a Project site are generally considered to be within the service area of a Project, and the nearest Los Angeles Public Library (LAPL) is the Baldwin Hills Branch Library, which is about a mile away from the Project Site.[127]

The Los Angeles Public Library service area covers 468 square miles and over four million people. There are approximately 2.5 million cardholders and 10.8 million library visits for

[127] Los Angeles Public Library. Baldwin Hills Branch Library. Available at: https://www.lapl.org/branches/baldwin-hills, accessed on September 23, 2021.

all 73 library locations.[128] Website visits numbered at 11,466,412 million, vastly exceeding the amount of in person visits.[129]

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03% of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all direct and indirect costs.[130] Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be used for additional staff, books, computers, and other library materials. Therefore, impacts to library facilities would be less than significant. .

16. Recreation

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. Refer to discussion 15(d) above.

128 Los Angeles Public Library. By the Numbers: Fiscal Year 2019-2020. Available at: https://www.lapl.org/about-lapl/press/library-facts, accessed on September 23, 2021.

129 Ibid.

130 Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed July 2020.

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Proposed Project does not propose recreational facilities outside of the Project Site boundaries, such as a park. Therefore, the Project does not involve the construction of recreational facilities that would have an adverse physical effect on the environment, and no impact would occur. While the Project does include open space amenities, the environmental effects of those amenities are evaluated elsewhere within this SCEA.

17. Transportation

A transportation assessment report was prepared to identify and evaluate the potential transportation impacts of the Proposed Project on the regional network. This report is attached as **Appendix F**.

The transportation assessment follows City of Los Angeles ("City") transportation assessment guidelines1 (TAG). The City's TAG are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, and safety, sustainability and smart growth. In compliance with the California Environmental Quality Act (CEQA), the City's TAG identify vehicle miles traveled (VMT) as the primary metric for evaluating a project's transportation impacts along with whether the Proposed Project conflicts or is inconsistent with local plans and policies. In addition, the City's TAG require evaluation of non-CEQA mobility elements such as pedestrian, bicycle and transit access, project access and circulation, project construction, and the potential for residential street intrusion.

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. In general, transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies.

The methodology for determining project impacts associated with conflicts with plans, programs, ordinances, or policies is defined per the City's TAG as follows:

- A project that generally conforms with, and does not obstruct, the City's development policies and standards will generally be consistent. The Project Applicant should review the documents and ordinances identified in the TAG (refer to Table 2.1-1 on pages 2-3 and 2-4) for City plans, policies, programs, ordinances and standards relevant to determining project consistency. The list highlights City documents that establish the regulatory framework. Attachment D of TAG contains a Plan Consistency Worksheet which provides a specific list of questions that must be answered to help guide whether the project conflicts with City circulation system policies. A 'yes' or 'no' answer to these questions does not determine a conflict. Rather, as indicated in Attachment D of the TAG, the Project Applicant must provide substantiating information to help determine whether the Proposed Project precludes the City's implementation of any adopted policy and/or program that was adopted to protect the environment. A mere conflict with adopted transportation related policies, or standards that requires administrative relief or legislative change does not in itself constitute an impact.

- If vacation of a public right-of-way, or relief from a required street dedication is sought as part of a proposed project, an assessment should be made as to whether the right-of-way in question is necessary to serve a long-term mobility need, as

defined in the Mobility Plan 2035, transportation specific plan, or other planned improvement in the future.

- The analysis of cumulative impacts may be quantitative or qualitative. Each of the plans, ordinances and policies reviewed to assess potential conflicts with proposed projects should be reviewed to assess cumulative impacts that may result from the Proposed Project in combination with other development projects in the study area. In addition, the cumulative analysis should also consider known development projects and planned transportation system improvements within the study area as identified in consultation with LADOT.[131]

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 Proposed Project is being designed to be consistent with these mobility goals. The Project provides direct pedestrian access to the Project Site from sidewalks along South La Cienega Boulevard and Jefferson Boulevard. The Proposed Project design does not result in modifying, removing, or otherwise affecting existing bicycle infrastructure, and

[131] A SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior environmental review, in this case the SCAG Connect SoCal RTP/SCS EIR, certified in May 2020, and the West Adams – Baldwin Hills – Leimert Community Plan EIR, which was certified in May 2016.

the Project driveways are not proposed along streets with existing bicycle facilities. The Proposed Project encourages non-motorized travel through provision of short- and long-term bicycle parking and will promote transit usage by complying with the City's TDM Ordinance. Also, the Proposed Project is located adjacent to the Metro E Line (Expo) La Cienega / Jefferson Station and a number of Metro and other transit service provider bus lines and proposes to provide a new public plaza connecting with the bicycle path, Metro station, and surrounding neighborhood.

The Proposed Project would maintain the designated driveway and roadway width requirements as indicated in the Mobility Plan. The existing driveway on South La Cienega Boulevard is planned to be maintained and modified and no new driveways along La Cienega Boulevard are proposed.

South La Cienega Boulevard is designated as a Modified Boulevard II roadway in the Mobility Plan. This standard requires a 52-foot half right-of-way width, a 40-foot half roadway width, and a 12-foot sidewalk width. South La Cienega Boulevard currently has a 50-foot half right-of-way width, a 40-foot half roadway width, and a 10-foot sidewalk width. As such, a 2-foot dedication is required to bring the 50-foot half right-of-way width into compliance with the City's 52-foot half right-of-way standard for Modified Boulevard II classification roadways. A relief from the required street dedication is being sought as part of the Proposed Project. This dedication would cause a reduction in the number of residential units that the applicant is entitled to build under the State Density Bonus Law and in the density of the commercial space of the Proposed Project with the loss of the property's square footage. La Cienega also serves as the project's primary frontage due to the location of bike path and Metro Line between the Project Site and Jefferson Boulevard. As such, the applicant desires to enhance the primary frontage.

The Applicant will need a waiver of this dedication for each of these reasons. Even if the dedication were granted, the street dedication of two (2) feet is not likely to occur south of the Project Site since the existing See's Candies building, which is located immediately south of the Project Site, was constructed with the façade directly at the current property line and is eligible for listing as a historic cultural monument which would render unlikely its future demolition or major renovation. Therefore, a continuous, expanded sidewalk width would not be afforded along the South La Cienega Boulevard corridor even with the dedication along the Proposed Project's frontage. In addition, the project proposes to provide a setback ranging from two (2) to eight (8) feet along South La Cienega Boulevard and will comply with any applicable open space and streetscape requirements of the West Adams CPIO District. Furthermore, the west side of South La Cienega Boulevard currently has a 50-foot half right-of-way width for the entire length of the roadway until Obama Boulevard to the south. No roadway widenings (i.e., curb line modifications) are

currently proposed on South La Cienega Boulevard, and for the reasons stated above, it is unlikely any widening would occur in the future.

The Proposed Project would nevertheless be consistent with the goals of the Mobility Plan even if the two-foot dedication is not granted since the Project would still advance all the Mobility Plan's mobility priorities without this dedication. For example, the Proposed Project would promote the Mobility Plan's priorities, including Safety First because the Proposed Project will preserve the safe operation of the existing street infrastructure that would serve the Project. All sidewalks, curb ramps and ADA ramps along the Project frontage would be designed in compliance with ADA standards. The Proposed Project would also provide sufficient off-street parking to accommodate the project's typical daily parking demand. The Proposed Project will improve the City's World Class Infrastructure, another mobility priority, by enhancing the pedestrian access, paths, bikeways, and street frontage along La Cienega Boulevard that serve the Project, the Metro Station the existing bikeways, as described above. By doing so, the Proposed Project would ensure fair and equitable access for all Angelenos and promote clean environments and healthy communities, two other Mobility Plan mobility priorities.

The Proposed Project will thus advance the Mobility Plan's mobility priorities and policies. Therefore, the Proposed Project is consistent with and would not obstruct the implementation of the Mobility Plan.

Plan for a Healthy Los Angeles

A Health and Wellness Element of the General Plan 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 Proposed Project will be consistent with the Plan for a Healthy Los Angeles by including 22 very low-income affordable housing dwelling units, 7 workforce units, and 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. The inclusion of low income and workforce housing helps to ease the region's housing burden and places low income and workforce housing near high quality transit, reducing the cost of transportation for the residents of those units who will not be required to drive long distances to jobs, shops and other amenities. Further, the Proposed Project supports healthy lifestyles by providing bicycle parking, access to the existing bike path, and enhancing the pedestrian environment by providing trees and landscaped plaza/s internal to the site to create a more comfortable environment for pedestrians. The project

also emphasizes sustainable design and materials to further the Plan's goals. Thus, the Proposed Project would be consistent with the goals of the 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 Proposed Project is located in the West Adams-Baldwin Hills-Leimert Community Plan area. The Proposed Project site is also situated within the Jefferson/La Cienega Transit Oriented Development (TOD) Subarea of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (West Adams CPIO District). A detailed analysis of the Proposed Project's consistency with the West Adams-Baldwin Hills-Leimert Community Plan area is provided in Section Land Use of this SCEA as well as in the entitlement application. The Proposed Project is also consistent with the circulation standards and criteria of the West Adams-Baldwin Hills-Leimert Community Plan as the transportation system adjacent to the Project Site would adequately serve the traffic generated by the project without major congestion, as demonstrated by the Proposed Project's transportation assessments.

Los Angeles Municipal Code (LAMC) Section 12.21A.16 – Bicycle Parking

LAMC Section 12.21A.16 details the bicycle parking requirements for new developments. As described in the project description, construction of the Proposed Project would require 36 short-term and 186 long-term bicycle spaces. The Proposed Project's bicycle parking supply would comply and thus be consistent with these LAMC requirements.

LAMC Section 12.26.J – Transportation Demand Management

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 square feet. The proposed project's new nonresidential components would exceed 25,000 square feet, and therefore LAMC Section 12.26J would apply to the Project. The Proposed Project would comply with and not conflict with the requirements of LAMC Section 12.26.J, as discussed below. The Proposed Project TDM strategies are in the form of education and encouragement regarding transportation options, bicycle parking, and bicycle infrastructure such as lockers and showers. Implementation of these TDM strategies are included in the Project as project design features.

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. A two (2)-foot dedication is required to bring the 50-foot half right-of-way width into compliance with the City's 52-foot half right-of-way standard for Modified Boulevard II classification roadways.

A relief from the required street dedication is being sought as part of the Proposed Project. This dedication would cause a reduction in the number of residential units that the applicant is entitled to build under the State Density Bonus Law and in the density of the commercial space of the Proposed Project with the loss of the property's square footage. La Cienega also serves as the project's primary frontage due to the location of bike path and Metro Line between the Project Site and Jefferson Boulevard. As such, the applicant desires to enhance the primary frontage. Even if the dedication were granted, the street dedication of two (2) feet is not envisioned to occur south of the Project Site since the existing See's Candies building, which is located immediately south of the Project Site, was constructed with the façade directly at the current property line. Therefore, a continuous, expanded sidewalk width would not be afforded along the South La Cienega Boulevard corridor even with the dedication along the Proposed Project's frontage. The existing See's Candies building is also eligible for listing as a historic cultural monument, resulting in the unlikely future demolition or major renovation of the structure. In addition, the project proposes to provide a setback ranging from two (2) to eight (8) feet along South La Cienega Boulevard and will comply with any applicable open space and streetscape requirements of the West Adams CPIO District. Furthermore, the west side of South La Cienega Boulevard currently has a 50-foot half right-of-way width for the entire length of the roadway until Obama Boulevard to the south. No roadway widenings (i.e., curb line modifications) are currently proposed on South La Cienega Boulevard, and for the reasons stated above, it is unlikely any widening would occur in the future. The Proposed Project is being designed to also comply with applicable Fire Department requirements as it relates to the internal roadway system. Thus, the Proposed Project would be consistent with LAMC Section 12.37.

Vision Zero Action and Corridor Plans

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 (HIN) where City projects will be targeted. The Project Site is located adjacent to South La Cienega Boulevard, which is identified as part of the HIN. Therefore, the Proposed Project is expected to contribute additional vehicular or active transportation

trips to roadways designated as part of the HIN. The Proposed Project is being designed to be consistent with Vision Zero goals. The Proposed 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

The Proposed Project site is situated within the Jefferson/La Cienega Transit Oriented Development (TOD) Subarea of the West Adams-Baldwin Hills-Leimert Community Plan Implementation Overlay District (West Adams CPIO District). An overlay is an additional layer of planning control applied to properties in a clearly defined geographic area. Overlays function as tailored zoning districts, each with its own specialized set of regulations. Overlays implement the City's General Plan and Community Plans through neighborhood-specific policy objectives, supplementing the underlying base zoning. The Proposed Project will comply with any applicable open space and streetscape requirements of the West Adams CPIO District.

Citywide Design Guidelines

Citywide Design Guidelines (Los Angeles City Planning Urban Design Studio, October 2019) identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. 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.

The Proposed Project has been designed to encourage walking as a transportation mode[132]. Walkways are planned within the Proposed Project which will connect to adjacent sidewalks in a manner that promotes walkability. Walkability indicates walking is readily available as a safe, connected, accessible and pleasant mode of transport. Several criteria are widely accepted as key aspects of walkability of urban areas that should be satisfied. The underlying principle is that pedestrians should not be delayed, diverted, or placed in danger. These criteria include:

- Connectivity: People can walk from one place to another without encountering major obstacles, obstructions, or loss of connectivity.

- Convivial: Pedestrian routes are friendly and attractive, and perceived as such by pedestrians.

- Conspicuous: Suitable levels of lighting, visibility and surveillance over its entire length, with high quality delineation and signage.

- Comfortable: High quality and well-maintained footpaths of suitable widths, attractive landscaping and architecture, shelter and rest spaces, and a suitable allocation of roadspace to pedestrians.

- Convenient: Walking is a realistic travel choice, partly because of the impact of the other criteria set forth above, but also because walking routes are of a suitable length as a result of land use planning with minimal delays.

These primary characteristics are accommodated within the Project. Proposed Project features would include landscaped and lighted pedestrian walkways connecting facilities within the site, as well as connections with the adjacent public sidewalks on the South La Cienega Boulevard and Jefferson Boulevard project frontages. In addition, the Proposed Project will have approximately one acre of ground level landscaping, open space, and interactive features including a new public plaza connecting with the bicycle path, Metro station, and surrounding neighborhood as well as a landscaped semi-public plaza located between the two buildings that stretch parallel to the bicycle path. Street trees and streetscape plantings should be introduced along the same public frontages in accordance with the City's standards. In addition, project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the Project Site, building identification signs, and other sign types. Wayfinding signs would be located at

[132] For example, refer to http://www.walkscore.com/, which generates a walkability score of approximately 73 (Very Walkable) out of 100 for the project site. Walk Score calculates the walkability of an address by locating nearby stores, restaurants, schools, parks, etc. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for walking.

access points to the on-site amenities and facilities, parking areas, commercial and residential entries, corridors and elevator lobbies.

Regarding vehicle access, the existing vehicular driveway on South La Cienega Boulevard would continue to accommodate right-turn ingress and egress movements only for motorists accessing the Project Site.

A secondary, one-way exit is planned to be provided via a 20-foot strip of land connecting the project site to Corbett Street to the south. Corbett Street is a 40-foot private roadway located south of the project site and extends between Jefferson Boulevard to the west and South La Cienega Boulevard to the east. Motorists will be able to exit the Project Site southerly via the secondary access roadway and access South La Cienega Boulevard to the east (i.e., only left turns are allowed from the project site onto Corbett Street).

A residential vehicle drop-off area is planned to be provided at the southeast corner of the residential building. A vehicular drop-off area for the commercial uses is planned to be provided at the southwest corner of the commercial building. Both proposed drop-off areas will be accessed from the vehicular driveway on South La Cienega Boulevard. The design of vehicular access will not degrade the pedestrian experience as vehicles will be routed away from the primary pedestrian areas.

The Proposed Project would be consistent with the Design Guidelines. Adequate sidewalks will be provided and enhanced 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 Proposed Project would align with Citywide Design Guidelines to provide a safe, comfortable, and accessible experience for all transportation modes.

As shown above, build-out (i.e., year 2025) of the Proposed Project has been found to be consistent with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Further, the Applicant will comply with existing applicable City ordinances (e.g., the City's existing TDM Ordinance, referred to in the City of Los Angeles Municipal Code Section 12.26.J) and the other requirements pursuant to the City's Municipal Code.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☒	☐	☐

Less than Significant Impact with Mitigation. The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the *CEQA Guidelines* in November 2017 and an accompanying technical advisory guidance finalized in December 2018 (OPR Technical Advisory) that amends the Appendix G threshold for significance for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the *CEQA Guidelines* asking if the project will result in a substantial increase in vehicle miles traveled (VMT).). The California Natural Resources Agency certified and adopted the *CEQA Guidelines* (Public Resources Code 21000–21189) in December of 2018 and are now in effect. Accordingly, the City of Los Angeles has adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G threshold for significance. For land use projects, the intent of this threshold is to assess whether vehicle miles traveled exceeds an applicable threshold of significance.

Screening Criteria

As outlined in the City's current TAG, if the project requires discretionary action, and the answer is no to either T-2.1-1 or T-2.1-2 stated below, further analysis will not be required for CEQA Threshold T-2.1, and a "no impact" determination can be made for that threshold:

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

  For purposes of screening the daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the City's VMT Calculator tool or the most recent edition of the ITE *Trip Generation Manual*. TDM strategies that are to be applied as mitigation measures should not be considered for the purposes of screening. If existing land uses are present on the Project Site or there were previously terminated land uses that meet the criteria for trip credits described in the trip generation methodology discussion (refer to Subsection 3.3.4.1 of the TAG), the

daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT Calculator tool and subtracted from the Proposed Project's daily vehicle trips to determine the net increase in daily vehicle trips.

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

  For the purpose of screening the VMT, a project's daily VMT should be estimated using the City's VMT Calculator tool or the City's Travel Demand Forecasting (TDF) model. TDM strategies should not be considered for the purpose of screening. If existing land uses are present on the Project Site or there were previously terminated land uses that meet the criteria for trip credits description in the trip generation methodology discussion (refer to Subsection 3.3.4.1 of the TAG), the daily VMT generated by the existing or qualified terminated land uses can be estimated using the City VMT Calculator tool and subtracted from the project's daily VMT to determine the net increase in daily VMT.

  In addition to the above screening criteria, the portion or the entirety of a project that contains small-scale or local serving retail uses[133] are assumed to have less than significant VMT impacts. If the answer to the following question is no, then that portion of the project meets the screening criteria and a no impact determination can be made for the portion of the project that contains retail uses. However, if the retail project is part of a larger mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with the above screening criteria. Projects that include retail uses in excess of the screening criteria would need to evaluate the entirety of the project's VMT, as specified in Subsection 2.2.4 of the TAG.

- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?

Independent of the above screening criteria, and if the project requires a discretionary action, further analysis will be required if the following statement is true:

- Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

For the purposes of screening for a proposed change in housing units located near fixed-rail or fixed-guideway transit for development projects, the total number of housing units

[133] As noted in the TAG, the definition of retail for this purpose includes restaurant.

that exist on the Project Site should be counted and compared to the total number of housing units as proposed by the project to determine if the project would result in a net decrease in housing units.

Impact Criteria and Methodology

For development projects, the Proposed Project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.

- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.

- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT.

- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. As the Project Site is located in the South Los Angeles APC, the VMT impact criteria (i.e., 15% below the APC average) applicable to the Proposed Project is 6.0 daily household VMT per capita for the residential component and 11.6 daily work VMT per employee for the general office land use component.

The impact methodology set forth in the TAG for a mixed-use project such as the Proposed Project is as follows:

- Mixed-Use Projects. The project VMT impact should be considered significant if, after taking credit for internal capture, the project exceeds the impact criteria for any one (or all) of a particular project land use(s). In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Transportation Demand Management Measures

The City's VMT Calculator tool also estimates the effectiveness of potential VMT reduction strategies both as project design features and as mitigation measures in

addition to estimating whether a development project exceeds the VMT thresholds. A total of 22 strategies are built into the VMT Calculator, covering several categories including parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancements. These strategies address the potential VMT reductions available due to certain types of project site modifications, programming, and operational changes which are collectively known as Transportation Demand Management (TDM) strategies. The effectiveness of each strategy is primarily based on research documented in *Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010)*[134]. The VMT Calculator either utilizes the methodology provided in the CAPCOA document directly or adjusts the methodology to account for local needs and departmental goals. A detailed review of the 22 pre-defined TDM strategies included in the VMT Calculator, including the definitions, benefits, and applicability of each measure, is presented in Attachment G to the City's TAG, *Transportation Demand Management Strategies in LA VMT Calculator*.

The Applicant will comply with existing applicable City ordinances (e.g., the City's existing Transportation Demand Management [TDM] Ordinance, referred to in the City of Los Angeles Municipal Code Section 12.26.J) and the other requirements per the City's Municipal Code. The following TDM strategies included in the VMT Calculator have been applied as project design features:

- **Education and Encouragement: Promotions and Marketing.** This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. For the purposes of the analysis, it is assumed that every employee would be eligible for passive marketing and promotional materials.

- **Bicycle Infrastructure: Include Bike Parking Per LAMC.** This strategy involves the implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations. Projects providing short-term and long-term bicycle parking in accordance with LAMC Section 12.21A.16 qualify for this measure. The applicant has indicated that the Proposed Project will comply with the short-term and long-term bicycle parking requirements of the Los Angeles Municipal Code.

134 *Quantifying Greenhouse Gas Mitigation Measures*, California Air Pollution Control Officers Association (CAPCOA), 2010.

- **Bicycle Infrastructure: Include Secure Bike Parking and Showers.** This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. Projects providing long-term bicycle parking secured from the general public in accordance with LAMC Section 12.21A.16(d)(2) and showers in accordance with LAMC Section 91.6307 qualify for this measure. The applicant has indicated that the Proposed Project will comply with the requirements of the Los Angeles Municipal Code and provide showers, lockers, and bicycle storage with bicycle repair equipment, and 36 short term and 186 long term bicycle parking spaces.

- **Neighborhood Enhancement: Pedestrian Network Improvements.** This strategy involves implementation of pedestrian network improvements throughout and around the Project Site that encourage people to walk. This includes internally linking all uses within the Project Site with pedestrian facilities such as pathways and walkways and connecting the Project Site to the surrounding pedestrian network. It also includes the elimination of barriers such as walls, landscaping, and slopes that impede pedestrian circulation. The Proposed Project includes pedestrian infrastructure to connect facilities within the site and the surrounding street system. Proposed Project features include landscaped and lighted pedestrian walkways connecting facilities within the site, as well as connections with the adjacent public sidewalks on the South La Cienega Boulevard and Jefferson Boulevard project frontages. In addition, the Proposed Project will have approximately one acre of ground level landscaping, open space, and interactive features including a new public plaza connecting with the bicycle path, Metro station, and surrounding neighborhood as well as a landscaped semi-public plaza located between the two buildings that stretch parallel to the bicycle path. Street trees and streetscape plantings should be introduced along the same public frontages in accordance with the City's standards. In addition, Project signage could include general ground level and wayfinding pedestrian signage around the perimeter of the Project Site, building identification signs, and other sign types.

Summary of VMT Analysis

The daily vehicle trips and VMT expected to be generated by the Proposed Project were forecast using the City's VMT Calculator tool. The TDM strategies proposed as part of the project were incorporated into the base assumptions of the VMT calculator as project design features. The Proposed Project is forecast to generate the following with the above-referenced TDM strategies incorporated into the Proposed Project as project design features:

- A net total of 3,200 daily vehicle trips.
- A net total of 27,633 daily VMT.
- The estimated household VMT per capita for the Proposed Project is 6.0 VMT per capita, which is equal to the South Los Angeles APC significance threshold of 6.0 VMT per capita. Pursuant to the TAG, a development project will have a potential significant impact if the project meets the following: For residential projects, the project would generate household VMT per capita *exceeding* 15% below the existing average household VMT per capita for the APC area in which the project is located. The Proposed Project would not exceed the household VMT per capita for the South Los Angeles APC.
- The estimated work VMT per employee for the Proposed Project is 12.3 work VMT per employee, which is above the South Los Angeles APC significance threshold of 11.6 work VMT per employee. As noted above, for office projects, the project would have a potential VMT impact if the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located. Thus, the project is expected to result in a significant VMT impact. Therefore, mitigation is necessary as it relates to VMT.

The estimated work VMT per employee for the proposed project is 12.3 work VMT per employee, which is above the South Los Angeles APC significance threshold of 11.6 VMT per employee. The following TDM strategy included in the VMT Calculator has been determined to be applicable as a project mitigation measure:

MM TR1: Commute Trip Reductions: Ride Share Program. The project applicant shall implement a ride share program that involves the use of ride-share matching services, designated preferred parking for ride-share participants, adequate passenger loading/unloading and waiting areas for ride-share vehicles, and a website or message board to connect riders and coordinate rides in order to increase vehicle occupancy. The Ride Share Program shall be implemented in year one following the issuance of the final certificate of occupancy for the commercial building. The project applicant shall maintain proof of implementation of the rideshare program to provide to LA DOT upon request.

The work VMT per employee for the proposed project would subsequently be reduced to 10.4 work VMT per employee, which is below the South Los Angeles APC significance

threshold of 11.6 VMT per employee. The total VMT for the Proposed Project would also be reduced as follows:

- A net total of 3,061 daily vehicle trips.
- A net total of 25,937 daily VMT.

Therefore, the Mitigation Measure is expected to reduce the project's VMT to a less than significant level.

As stated in the City's TAG document (refer to page 2-12 of the TAG), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with the Southern California Association of Government's (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita, VMT per employee, or VMT per service population) in the impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact and that such projects are consistent with the RTP/SCS. Projects, such as the Proposed Project that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS. Based on the above, the Proposed Project's impacts are considered less than significant with mitigation.

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)?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A significant impact could occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

For vehicle, bicycle and pedestrian safety impacts, a review of all project access points, internal circulation, and parking access from an operational and safety perspective (for example, turning radii, driveway queuing, line of sight for turns into and out of project driveway[s]) was conducted. Where project driveways would cross pedestrian facilities or bicycle facilities (bike lanes or bike paths), operational and safety issues related to the potential for vehicle/pedestrian and vehicle/bicycle conflicts and the severity of consequences that could result was considered. In areas with moderate to high levels of pedestrian or bicycle activity, the collection of pedestrian or bicycle count data is required.

The existing vehicular driveway on South La Cienega Boulevard would continue to accommodate right-turn ingress and egress movements only for motorists accessing the Project Site. A secondary, one-way exit is planned to be provided via a 20-foot strip of land connecting the project site to Corbett Street to the south. Motorists will be able to exit the Project Site southerly via the secondary access roadway and access South La Cienega Boulevard to the east (i.e., only left turns are allowed from the project site onto Corbett Street).

A residential vehicle drop-off area is planned to be provided at the southeast corner of the residential building. A vehicular drop-off area for the commercial uses is planned to be provided at the southwest corner of the commercial building.

As the Proposed Project driveway location is essentially the same as what exists under current conditions and based on a review of the forecast net new weekday AM and PM peak hour project traffic volume, no safety concerns related to geometric design are noted. Moreover, the Proposed Project would not include unusual or hazardous design features that are atypical to large scale commercial and residential developments. Impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A significant impact could occur if the Project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Proposed Project Site or adjacent uses. Development of the Project Site may require temporary and/or partial street and sidewalk closures due to construction activities. Such closures would be coordinated with the City of Los Angeles Departments of Transportation, Buildings and Safety, and the Department of Public Works. Closures would not be expected to interfere with emergency response or evacuation plans. As described under Public Services, this Proposed Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Proposed Project would be subject to site plan review by the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Because the Proposed Project would not be expected to result in inadequate emergency access, impacts would less than significant.

18. Tribal Cultural Resources

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

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

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant.

A search result for the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was received on January 8, 2021. The result was positive and suggested that the Gabrieleno/Tongva San Gabriel Band of Mission Indians be contacted. The NAHC also provided a list of six additional tribal entities (Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino/Tongva Nation, Gabrielino Tongva Indians of California Tribal Council, Gabrielino- Tongva Tribe, Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseno Indians) who may also have knowledge of cultural resources in the Project area. A letter of inquiry was sent to the Gabrieleno/Tongva San Gabriel Band of Mission Indians on January 11, 2021, but no response has been received to date.

As described in the Cultural Resources section of this SCEA, an archaeological report was prepared in anticipation of the Proposed Project.[135] The report noted that the archaeological pedestrian survey did not result in the identification of any prehistoric or historic archaeological sites. However, several prehistoric sites have been previously documented in proximity to the Project and the NAHC search of the Sacred Lands File returned a positive result indicating that there are potential tribal cultural resources in the area that could be impacted by the Proposed Project.

While unlikely, it is possible that unknown archaeological resources or human remains could exist at the Project Site and could be encountered during excavation for the two proposed subterranean parking levels. As noted in Section 5(b) of this SCEA, the Project incorporate Mitigation Measures CR5 through CR8 of the West Adams Community Plan EIR, which would minimize impacts in the event archaeological resources are encountered during construction.

Past industrial use of the Project Site makes it unlikely that any previously undisturbed resources would be uncovered during Project construction. Further, the City has established a standard condition of approval (provided below) to address the inadvertent discovery of tribal cultural resources. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting of construction activities near the encounter, having the Project's certified construction monitor such activities for this purpose, and notifying the City and Native American tribes that have informed the City that 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 tribal cultural resource in case tribal resources are encountered. In the event of such an inadvertent discovery the City would provide any affected tribe a reasonable period of

[135] Cultural Resources Study Results for the 3401 W. La Cienega Boulevard Redevelopment Project, ASM Affiliates Inc., February 2021.

time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

Condition of Approval

Inadvertent discovery of tribal cultural resources: If objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Proposed Project; and (2) the Department of City Planning at (213) 978-1454.

- If the City determines, pursuant to PRC Section 21074(a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the project permittee and the City regarding the monitoring of future ground disturbance activities and the treatment and disposition of any discovered tribal cultural resources.

- The project permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The project permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project permittee shall not be allowed to recommence ground disturbance activities until the City approves this plan.

- If the project permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project permittee may request mediation by a mediator agreed to by the permittee and the City who

has the requisite professional qualifications and experience to mediate such a dispute. The project permittee shall pay any costs associated with the mediation.

- The project permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study or tribal cultural resources study or report detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton.

- Notwithstanding the above, any information determined to be confidential in nature by the City Attorney's office shall be excluded from submission to the SCCIC or the public under the applicable provisions of the California Public Records Act, California PRC, and shall comply with the City's AB 52 Confidentiality Protocols.

19. Utilities and Service Systems

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact.

Water

Water services for this Project would be provided by the Los Angeles Department of Water and Power (LADWP). LADWP is the primary provider of water and electric services for the City of Los Angeles, servicing more than four million customers in 473 square

miles through an intricate network of more than 7,000 miles of pipes.[136] The Project Site would be served by the existing system of water lines.

The 2015 Urban Water Management Plan (UWMP) was adopted in June 2016, and projects a demand of 611,800 acre-feet per year (AFY) in 2020 and 644,700 AFY in 2025.[137] The UWMP forecasts water demand by estimating baseline water consumption by use (single-family, multi-family, commercial/government, industrial), then by adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG's 2012 RTP.[138] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[139] Neither the UWMP forecasts, nor the 2012 RTP include parcel level zoning and land use designation as an input.

At the City level, any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with Metropolitan Water District (MWD) purchases to rise to the level of demand. As recently as March 2021, MWD has recognized uncertainties in water demand and supply. Future population growth, drought/environmental conditions, housing mix and economy are drivers that will have considerable influence on future demands on MWD supplies. While uncertainties exist, in its current form, the UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit. Further, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the water demand for the Project was also accounted for within the analysis contained in the water demand estimates in the West Adams-Baldwin Hills-Leimert Community Plan EIR. The West Adams Community Plan EIR determined the area had an existing demand of 22,475,081 gallons per day.[140] The EIR assumed implementation of the Plan[141] would result in a 17% increase in water demand as compared to existing water usage within the West Adams CPA. When compared to total water supplied by

136 Los Angeles Department of Water and Power, Facts & Figures, accessed on February 18, 2021, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=yvd8gvrjg_4&_afrLoop=19640900766831.

137 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.

138 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.

139 SCAG, 2012 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

140 City of Los Angeles Planning Department. West Adams-Baldwin Hills-Leimert Community Plan EIR. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html, accessed September 23, 2021.

141 The West Adams EIR assumed the following persons for buildout of the Plan in 2030: 30,903 single family units; 55,215 multi-family units; 44,329 commercial employees; 5,780 industrial employees, 216 open space employees; 2,787 public facilities employees.

LADWP in 2008 (the year of the EIR), the increase in water usage at full implementation of the Proposed Project in year 2030 would represent an additional 0.66% of water supplied by LADWP in year 2008. Of total expected water supplies available in year 2030, the water usage increase within the West Adams CPA due to the Proposed Project would represent an additional 0.61% of total expected water supplies and impacts therefore would be less than significant.

As shown on **Table IV-24**, the Proposed Project would demand an increase of approximately 68,235 gallons of water per day (or 0.068 mgd). This would account for approximately 0.3% of the existing water demand for the West Adams-Baldwin Hills-Leimert CPA and is well within the estimates for the West Adams Community Plan EIR, which did not identify significant impacts for wastewater. This total is a conservative estimate as it does not take any credit for any proposed sustainable and water conservation features of the Project. As provided in the Project Description, the Project includes numerous sustainable features aimed at increasing energy efficiency, reducing GHG emissions and water demand. These features include:

- Utilizing non-potable water for project irrigation and flushing demand
- Reduction in cooling tower demand
- Green roof
- Permeable surfaces such as concrete pavers

Therefore, impacts related to water supply would be less than significant.

Table IV-24
Project Water Generation During Operation

Land Use	Size	Generation Rate (gallons per day)	Water Demand (gallons per day)
Studio	26 du	90 gpd/du	2,340 gpd
1-Bedroom	143 du	132 gpd/du	18,876 gpd
2-bedroom	78 du	180 gpd/du	14,040 gpd
3-bedroom	13 du	228 gpd/du	2,964 gpd
Office	227,543 sf	144 gpd/1000 gsf	32,766 gpd
Retail	2,869 sf	30 gpd/1000 gsf	86 gpd
		Subtotal Proposed	71,072 gpd
		Existing	2,837 gpd
		Net New	68,235 gpd

Land Use	Size	Generation Rate (gallons per day)	Water Demand (gallons per day)

Source: Estimated water demand is generated using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012)). water consumption is assumed to be 120 % of wastewater generation.

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

Wastewater

The Los Angeles Bureau of Sanitation would provide sewer service to the proposed Project area. Sewage from the Project Site would be conveyed through existing infrastructure and deposited at the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 260 million gallons per day (mgd)[142] and has the capacity to treat 450 mgd.[143] This equals a remaining capacity of 190 mgd of wastewater able to be treated at the HTP.

The West Adams EIR evaluated capacity of the Plan area and determined that full implementation of the Plan would cause wastewater generation to increase by approximately 5.5 mgd over existing wastewater generation within West Adams CPA. This amounts to an increase of less than 1% of the current maximum treatment capacity of all four treatment plants (580 mgd). As shown in **Table IV-25**, the Proposed Project is estimated to generate a net total of approximately 56,413 gallons per day (or 0.056 mgd) of wastewater and is well within estimates for the CPA. With a remaining daily capacity of 190 mgd, the HTP would have adequate capacity to serve the Project's projected 0.056 mgd generation. Furthermore, the Proposed Project is not located in an area already experiencing constrained sewer capacity.[144] Further, as stated above, the Proposed Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates. Furthermore, the Project Applicant shall be required to implement applicable LA Green Building Code requirements that would further reduce wastewater flow. Features would include:

- Graywater waste drainage system

142 City of Los Angeles Department of Public Works, Bureau of Sanitation. 2019. Sewer System Management Plan. Available at: https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed on September 23, 2021.

143 City of Los Angeles Department of Public Works, Bureau of Sanitation, "Wastewater System Fact Sheet" (2014).

144 City of Los Angeles Planning Department. West Adams-Baldwin Hills-Leimert Community Plan EIR. Available at: https://planning.lacity.org/eir/westadams/westAdamsCoverPg.html, accessed September 23, 2021.

- Grease waste collection system
- Stormwater drainage system connected to infiltration or rainwater retention system.

Therefore, impacts related to wastewater treatment would be less than significant, and the Proposed Project would be adequately served by the City's wastewater facilities. As part of the Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve the Proposed Project, the Project Applicant would be required to install adequately sized sewer lines. Thus, sewer infrastructure would be adequate to accommodate the Proposed Project. Therefore, impacts related to wastewater service would be less than significant.

Table IV-25
Project Wastewater Generation During Operation

Land Use	Size	Generation Rate (gallons per day)	Water Demand (gallons per day)
Studio	26 du	75 gpd/du	1,950 gpd
1-Bedroom	143 du	110 gpd/du	15,730 gpd
2-bedroom	78 du	150 gpd/du	11,250 gpd
3-bedroom	13 du	190 gpd/du	2,470 gpd
Office	227,543 sf	120 gpd/1000 gsf	27,305 gpd
Retail	2,869 sf	25 gpd/1000 gsf	72 gpd
		Subtotal Proposed	58,777 gpd
		Existing	2,364 gpd
		Net New	56,413 gpd

Source: Estimated water demand is generated using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012)).

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

Stormwater

The Project Site is located within the Ballona Creek urban watershed[145] in a developed area of Los Angeles served by LA Sanitation. Therefore, this Project would be subject to the policies of the Watershed Protection Program, which employs a multi-pronged

[145] Los Angeles Geohub. *Watersheds*. https://geohub.lacity.org/datasets/watersheds?geometry=-118.375%2C34.025%2C-118.370%2C34.027.

approach to ensure the City of Los Angeles is in compliance with regulations and reduce the amount of pollution flowing into and through regional waterways.[146] One such regulation includes the LID Ordinance. The primary purpose of the LID Ordinance is to ensure development projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. The Stormwater LID Ordinance requires LID measures be incorporated into the design of all development and redevelopment projects that have a land disturbance activity and add, create or replace 500 square feet or more of impervious area. The Ordinance requires the preparation of a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Although final LID measures will be determined in coordination with the City, the Proposed Project will be required to comply with LID requirements for stormwater. In accordance with LID requirements, the Proposed Project will implement a LID system to mitigate stormwater by reducing pollutants and retaining stormwater on site. Los Angeles operates on a priority-based system requiring captured stormwater to be infiltrated into the ground, if site conditions allow, which will be determined by a geotechnical engineer. If infiltration is not feasible then a capture and use system will be implemented. If a capture system is deemed infeasible then biotreatment will be required. If biotreatment is used, the Proposed Project will need to capture 150 % of the design stormwater volume. Based on the City standards, the Proposed Project will need to treat approximately 93,500 gallons of stormwater on site. [147]

Further, as detailed in 'Hydrology and Water Quality' above, the Proposed Project is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ[148] as well as NPDES Construction General Permit and a SWPPP would be prepared and implemented for the Proposed Project in compliance with the requirements of the NPDES Permit. The SWPPP would identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

146 Watershed Protection, LA Sanitation – City of Los Angeles, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp?_afrLoop=2799911397528235&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_299#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2799911397528235%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_303.

147 Preliminary Engineering Feasibility Report, KPFF, October 28, 2020.

148 Watershed Protection, General Construction Activity Stormwater Permit, LA Sanitation – City of Los Angeles, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp/s-lsh-wwd-wp-ec/s-lsh-wwd-wp-ec-rm?_afrLoop=2802032421121765&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=nqhx0d7oj_1068#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D2802032421121765%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dnqhx0d7oj_1072.

Electric power, Natural gas, and Telecommunications

Based on the survey and existing Los Angeles records, there are several utility easements in and near the Project Site. There is a 40-foot-wide existing easement for sewer, water, and gas. The easement is defined as Corbett Street (a private street) located 250 feet south of the Project Site. The easement extends 1,025 feet to the west from La Cienega Boulevard. The sanitary sewer and water line are owned by the City of Los Angeles and the gas line is owned by Southern California Gas. New connection to the private street utilities would require further approval of the private owner and the City. The portion of the existing self-storage facility proposed to be demolished does not contain electrical, gas, or telecommunications generation or transmission infrastructure that would need to be relocated off-site.

The Proposed Project will be all electric and will not use natural gas. The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electric power, and telecommunications services. Electricity would be provided by LADWP. In the context of the greater Los Angeles service area and the growth forecasts used by utility service providers, the Proposed Project would not be a substantial source of new unplanned demand for electrical, gas or telecommunications services (Refer to **Section IV-6, Energy,** above). New connections for the Proposed Project would be coordinated with the appropriate service provider. Any trenching or other excavation within the public right of way would also be coordinated with the City Department of Public Works.

As such, the Project would not require relocation of electrical, gas, or telecommunications facilities, the relocation of which could cause significant environmental effects. Therefore, impacts to water, wastewater, stormwater, and other utilities would be less than significant

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?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. Refer to ‘a’ above. As shown in **Table IV-28** under projected water use, the Proposed Project would result in a net increase of approximately 68,235 gallons per day in water consumption. The Proposed Project does not materially alter socioeconomic variables or projected growth by use which means the anticipated

land use on the Project Site was accounted for in estimates prepared by LADWP. The UWMP demonstrates adequate current and future capacity to accommodate City growth into which the Proposed Project would easily fit. Further, water demand estimates in for the West Adams Community Plan assumed buildout of the Plan area, including more than 55,215 new multifamily dwelling units and 44,329 new employees. The Proposed Project includes 260 multifamily units and is well within the capacity evaluated in the West Adams Community Plan EIR. Of total expected water supplies available in year 2030, the water usage increase within the entire West Adams CPA due to the Plan would represent an additional 0.61% of total expected water supplies. Therefore, the anticipated increase in demand for water supplies on the Project Site represents a small proportion of total anticipated water supplies in year 2030. Additionally, the Proposed Project includes **PDF-1** to reduce water demand. Therefore, the water demand for the Project was also accounted for within the analysis contained in the West Adams EIR and impacts would be less than significant.

c. *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. Refer to 'a' above. With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Proposed Project's projected 0.056 mgd generation. Further, as stated above, the Proposed Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, the wastewater generation for the Project was accounted for within City and regional estimates.

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?*

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout the County of Los Angeles. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill. The County's Public Works Department prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.[149] The Countywide Class III landfill remaining capacity is estimated to be 148.4 million tons.[150]

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75% of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete.

As shown in **Table IV-26**, after accounting for mandatory recycling, the Proposed Project would result in approximately 2,337 tons of construction waste. Given the remaining 148.4 million tons of capacity at the Class III landfills within the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table IV-26
Project Construction Waste Generation

Land Use	Size	Generation Rate (Lb/sf)	Total (tons)
Residential (Multi-family)	230,412 sf	4.05	467
Office	227,543 sf	3.92	446
Retail	2,869 sf	4.00	6

149 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

150 Los Angeles County Public Works. 2020. Integrated Waste Management Plan: 2019 Annual Report. Available at: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed on September 23, 2021.

Land Use	Size	Generation Rate (Lb/sf)	Total (tons)
Demolition of Existing	78,793 sf	36.00	1,418
Total			**2,337**

Note: sf = square feet; 1 ton = 2,000 pounds. Rate: U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types

Impact Sciences, 2021

As shown in **Table IV-27**, the Proposed Project's operations would generate a net increase of approximately 370 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90% by the year 2025.[151]

The increase in solid waste disposal from the Proposed Project's operations would represent an approximate 0.01% increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The increase in solid waste disposal would represent approximately 0.0003% of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

Table IV-27
Projected Daily Solid Waste Generation

Land Use	Size	Generation Rate	Total (tons/year)
Residential (Multi-family)	260 du	4 lbs/dwelling unit/day	190
Office	227,543 sf	6 lbs/1000 sf/day	249
Retail	2,869 sf	5 lbs/1000 sf/day	3
		Projected Subtotal	442
		Existing	72

[151] The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/ home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lshwwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4

Land Use	Size	Generation Rate	Total (tons/year)
		Net Increase	**370**

Source: CalRecycle Estimated Solid Waste Generation Rates for Commercial, Service, and Residential uses, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

Note: sf = square feet; 1 ton = 2,000 pounds; du = dwelling unit

Based on the above, landfills that serve the Project Site would have sufficient permitted capacity to accommodate solid waste generated by construction and operation of the Proposed Project. Therefore, impacts would be less than significant.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste that is typical of retail and mixed-use residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal. Impacts would be less than significant.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project Site is located in an urbanized and built out area surrounded by existing roadways, transportation rails, and other infrastructure, and

is not located in a Very High Fire Hazard Zone.[152] The City of Los Angeles Emergency Operations Plan – Evacuation Annex identifies the LAFD as the lead in conducting evacuations for brush fires.[153] The Evacuation Annex's objectives include providing a concept of operations to support evacuation procedures including transportation resources. The Project Site is surrounded on all sides by existing infrastructure including roadways a bike path, and an elevated transit line. A major freeway, Interstate 10, is located about half a mile from the Site, providing ready access to residents and employees of the Proposed Project. Therefore, there is ample opportunity for residents and employees to vacate in the event of a wildfire. Accordingly, the Project would not impair any adopted emergency response plan or emergency evacuation plan and impacts would therefore be less than significant.

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Kenneth Hahn State Recreation Area is located approximately one and a half miles to the south and is an LAFD identified Very High Fire Zone. However, the Project Site and the intervening area does not have wildlands or natural habitat that could exacerbate an ongoing fire. The Project Site and surrounding area have long been fully developed with industrial, commercial, and residential uses in a highly urbanized fashion and does not contain vegetation that could contribute to the uncontrolled spread of wildfire. Therefore, given the urbanized location of the Project Site, the Project does not include any features that would exacerbate wildfire risk. This would result in a less than significant impact.

152 The Very High Fire Hazard Severity Zone (or "Zone") was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The "Zone" was carefully determined according to California State Law. Los Angeles Fire Department, Fire-Zone, https://www.lafd.org/fire-zone.

153 City of Los Angeles Evacuation Annex 2018, https://emergency.lacity.org/sites/g/files/wph1791/files/2021-04/evacuation_annex_2018.pdf

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

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☒	☐

Less than Significant Impact. The Project Site is located within an urbanized area of the City and does not include wildlands or high fire terrain. The Site is surrounded by existing infrastructure including roadways and a transit metro line and would not require the installation or maintenance of roads, fuel breaks, emergency water or other sources that could exacerbate fire risk. During construction, the Project would require temporary power from existing power lines. However, maintenance of these temporary power sources would be in accordance with LAFD requirements. As such, in the unlikely event of a fire on the Project Site during construction, accepted protocols would be followed to minimize risk to surrounding areas. Due to the urbanized nature of the area, it is unlikely any fire would spread beyond the confines of the Project Site. Therefore, impacts would be less than significant.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less than Significant Impact	No Impact
☐	☐	☐	☒

No Impact. The Project Site is relatively flat and would not be subject to any post fire slope instability or landslides. The Project Site is not within a designated Landslide Zone.[154] Therefore, there would be no impact.

[154] California Department of Conservation. Earthquake Zones of Required Investigation. Available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed August 20, 2021.

21. Earlier Analysis

Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See *CEQA Guidelines* Section 15063(c)(3)(D).

Earlier analysis used are listed below:

- West Adams-Baldwin Hills-Leimert Park New Community Plan Final EIR. May 2016. Available at: https://planning.lacity.org/eir/westadams/FEIR/West%20Adams%20New%20Community%20Plan%20Final%20EIR.html

- Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy) Final Program EIR. May 2020. Available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618

22. Mandatory Findings of Significance

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

Less than Significant Impact. As discussed under **Section IV.4, Biological Resources,** the Project would not impact any endangered fauna or flora. The West Adams CPA EIR provides Mitigation Measure BR1 that ensures compliance with the MBTA, which the Project would include as a condition of approval. Further, because of the highly urbanized nature of the Project Site and the surrounding area, construction and operation of the Proposed Project would not impact the habitat or population of the Project Site and the surrounding area. The Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare-endangered plant or animal.

As discussed in **Section IV.5, Cultural Resources**, potential impacts related to historical, archaeological, and paleontological resources would be less than significant following the implementation of West Adams – Baldwin Hills- Leimert Community Plan EIR Mitigation Measures as conditions of approval.

Therefore, the Project will not substantially degrade the quality of the land, air, water, minerals, flora, fauna, noise and objects of historic or aesthetic significance.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other developments to result in impacts that are greater than those of this Project alone. Located within the vicinity of the Project Site are other past, current, and reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. However, based on the proceeding discussions, no unmitigatable significant impacts were identified for the environmental resources identified in this SCEA. Further, the West Adams EIR evaluated the cumulative impacts of development within the Community Plan Area where the Proposed Project is located and is relied on in this SCEA. The Proposed Project would not result in any unmitigated significant impacts pursuant to the topics analyzed in the above Environmental Checklist, and therefore cumulative impacts would be less than significant.

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

Less than Significant With Mitigation Incorporated. A significant impact could occur if the Project has the potential to result in significant impacts. As identified throughout this SCEA, the Proposed Project would have no unmitigable significant impacts that would cause substantial adverse effects to human beings directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable conditions of approval and mitigation measures recommended. Therefore, the impact would be less than significant with mitigation incorporated.

V. LIST OF PREPARERS

Impact Sciences, Inc., has prepared this environmental document under contract to the Lendlease Corporation. Persons directly involved in the review and preparation of this report include:

Impact Sciences, Inc.
Jessica Kirchner Flores, AICP, Managing Principal
Doug Kim, AICP, Principal
John Anderson, MPA, M. Phil., Associate Principal
Kaitlyn Heck, Air Quality Specialist
Yasmeen Hussain, Planner III
Raul Castillo, MPL, Planner II
Kara Yates Hines, MPS, Publications Manager

RELM Studio
Scott D. Baker, PLA, President

Langan Engineering & Environmental Services, Inc.
Jason C. Goff, P.E., Project Engineer
Diane Fiorelli, P.E., G.E., Principal/Vice President

Linscott, Law & Greenspan Engineers
Francesca S. Bravo, Senior Transportation Engineer
Clare M. Look-Jaeger, P.E., Principal

Roux Associates, Inc.
Justin Allen, Project Scientist
Mauricio H. Escobar, P.G., Principal Geologist

ASM Affiliates
Marilyn Novell, M.S., Architectural Historian
Shannon Davis, M.A., Director, Architectural History

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