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

MITIGATED NEGATIVE DECLARATION

Melrose and Seward Project

Case Number: ENV-2021-2909-MND
CPC-2021-2908-ZC-HD-ZAD-WDI-SPR

Project Location: 6101-6117 West Melrose Avenue, 713-735 North Seward Street, Los Angeles, California, 90038.

Community Plan Area: Hollywood

Council District: 5 – Koretz, 13 – O'Farrell

Project Description: The Project would demolish an approximately 8,473 square-foot commercial building and proposes the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square-foot, creative office building. The northernmost portion of the Project Site includes two, two-story existing creative office buildings fronting North Seward Street, totaling approximately 17,134 square feet, that would be maintained as part of the Project. The Project would provide 168 vehicular parking spaces and 26 bicycle spaces within a two level subterranean parking garage and an at-grade enclosed parking area. The Project would be built on a 45,136 square-foot lot, resulting in a site-wide Floor Area Ratio (FAR) of approximately 1.88 to 1, inclusive of the existing buildings being retained as part of the Project. The anticipated outbound haul route from the Project Site would be along Melrose Avenue to Normandie Avenue, to the 101 freeway. Approximately 29,400 cubic yards of soil will be excavated and exported from the Project Site.

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

PREPARED BY:
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APPLICANT:
Melrose Avenue Owner, LLC
1015 N. Fairfax Avenue
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March 2022

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

An application for the proposed Melrose and Seward Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study (IS) evaluates potential environmental effects resulting from construction, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public *Resources* Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project, with mitigation would not result in significant impacts on the environment. This Initial Study and Mitigated Negative Declaration is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated

Negative Declaration is appropriate, an EIR is normally required.[1]

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

5 MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Program (MMP) is the document that will be used by the enforcement and monitoring agencies responsible for the implementation of the Project's mitigation measures and Project Design Features. Mitigation measures and Project Design Features are listed by environmental topic.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, efforts will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

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[1] *State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.*

1.1.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project could have potentially significant environmental impacts but mitigation measures agreed to by the applicant would avoid or reduce such impacts to a point where clearly no significant impacts would occur.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) or Negative Declaration (ND) is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the document and the locations where the document can be reviewed. A 20-day review period (or 30-day review period when the document is submitted to the State Clearinghouse for state agency review) is identified to allow the public and agencies to review the document. The notice is mailed to any interested parties and is noticed to the public through publication in a newspaper of general circulation.

The decision-making body then considers the Mitigated Negative Declaration or Negative Declaration, together with any comments received during the public review process, and may adopt the MND or ND and approve the project. In addition, when approving a project for which an MND or ND has been prepared, the decision-making body must find that there is no substantial evidence that the project will have a significant effect on the environment, and that the ND or MND reflects the lead agency's independent judgement and analysis. When adopting an MND, the lead agency must also adopt a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented to mitigate or avoid significant environmental effects.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**MELROSE AND SEWARD PROJECT**
ENVIRONMENTAL CASE NO.	**ENV-2021-2909-MND**
RELATED CASES	**CPC-2021-2908-ZC-HD-ZAD-WDI-SPR**

PROJECT LOCATION	6101-6117 W. Melrose Avenue, 713-735 N. Seward Street
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Commercial Manufacturing
ZONING	C4-1XL, and CM-1VL
COUNCIL DISTRICT	5 – Koretz, 13 – O'Farrell

LEAD CITY AGENCY	**City of Los Angeles Department of City Planning**
STAFF CONTACT	David Woon, Planning Assistant
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PHONE NUMBER	(213) 978-1368
EMAIL	david.woon@lacity.org

APPLICANT	Melrose Avenue Owner, LLC
ADDRESS	1015 N. Fairfax Avenue, West Hollywood, California 90046
PHONE NUMBER	(323) 461-8815

PROJECT DESCRIPTION

The Melrose and Seward Project proposes the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square foot, creative office building at the property located in the Hollywood Community Plan area at 6101-6117 West Melrose Avenue and 713-735 North Seward Street (the "Site") in the City of Los Angeles (the "City"). The northernmost portion of the Project Site includes two, two-story existing creative office buildings fronting North Seward Street, totaling approximately 17,134 square feet, that would be maintained as part of the project. The existing surface parking lots and existing one-story, approximately 8,473 square-foot commercial building fronting West Melrose Avenue would be demolished to allow for the location and construction of the new 67,889 square foot, creative office building proposed as part of the Project. The Project would provide 168 vehicular parking spaces and 26 bicycle spaces within a two level subterranean parking garage and an at-grade enclosed parking area. The Project would be built on a 45,136 square-foot lot, resulting in a site-wide FAR of approximately 1.88 to 1, inclusive of the existing buildings being retained as part of the Project. The Project's media-focused uses and forward-thinking post-pandemic design would continue and enhance the existing creative corridor along North Seward Street.

The Applicant is requesting the following discretionary approvals: A Zone Change and Height District Change from C4-1XL and CM-1VL to CM-2; a Zoning Administrator's Determination to allow the Project to exceed the maximum transitional height requirements set forth in the Los Angeles Municipal Code (LAMC) Section 12.21.1 A.10, a Site Plan Review to allow a development which results in an increase of approximately 67,889 gross square feet of nonresidential floor area; and a Waiver of Dedication and/or Improvement pursuant to LAMC Section 12.37 I.3, to waive all dedication and street widening requirements along North Seward Street and West Melrose Avenue. Other discretionary and ministerial permits and approvals that may be deemed necessary, include, but are limited to, haul route approval, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

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

ENVIRONMENTAL SETTING

The Project Site is comprised of three parcels with Assessor Parcel Numbers (APN Nos. 5533-037-005, 5533-037-024, 5533-037-023) that are rectangular in shape and total 45,136 square feet in area. The Project Site is currently zoned C4-1XL and CM-1VL and has a General Plan land use designation of Commercial Manufacturing. The Project Site is currently improved with three buildings and two surface parking lots. The building located on the southern portion of the Project Site is a one-story, approximately 8,473 square-foot commercial building, the two buildings located on the northern portion of the Project Site total approximately 17,134 square feet are one and two story creative office buildings. In between the buildings are two surface parking lots. One surface parking lot, which is accessed via one driveway off of North Seward

Street, is utilized by the commercial building on the southern portion of the Project Site. The other surface parking lot is a gated surface parking lot with one driveway located off of North Seward Street, which is utilized by the two existing creative office buildings located on the northern portion of the Project Site. The Project Site also contains vegetation landscaping and six non-protected trees (two street trees and four trees located on-site). The Project Site is located at 6101-6117 West Melrose Avenue and 713-735 North Seward Street, and is bounded by West Melrose Avenue to the south, by North Seward Street to the east, by the John C. Fremont Branch Library and residential uses to the west, and by commercial uses to the north. The anticipated outbound haul route from the Project Site would be along Melrose Avenue to Normandie Avenue, to the 101 freeway. Approximately 29,400 cubic yards of soil will be excavated and exported from the Project Site.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement): None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, a notification was sent on June 24, 2021 to ten tribes. The City did not receive any correspondence or request for consultation from the tribes.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

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 & Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Energy
- ☐ Geology / Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☒ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☒ Transportation
- ☐ Tribal Cultural Resources
- ☐ Utilities / 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 revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

David Woon	Planning Assistant
PRINTED NAME	**TITLE**
	3/9/22
SIGNATURE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

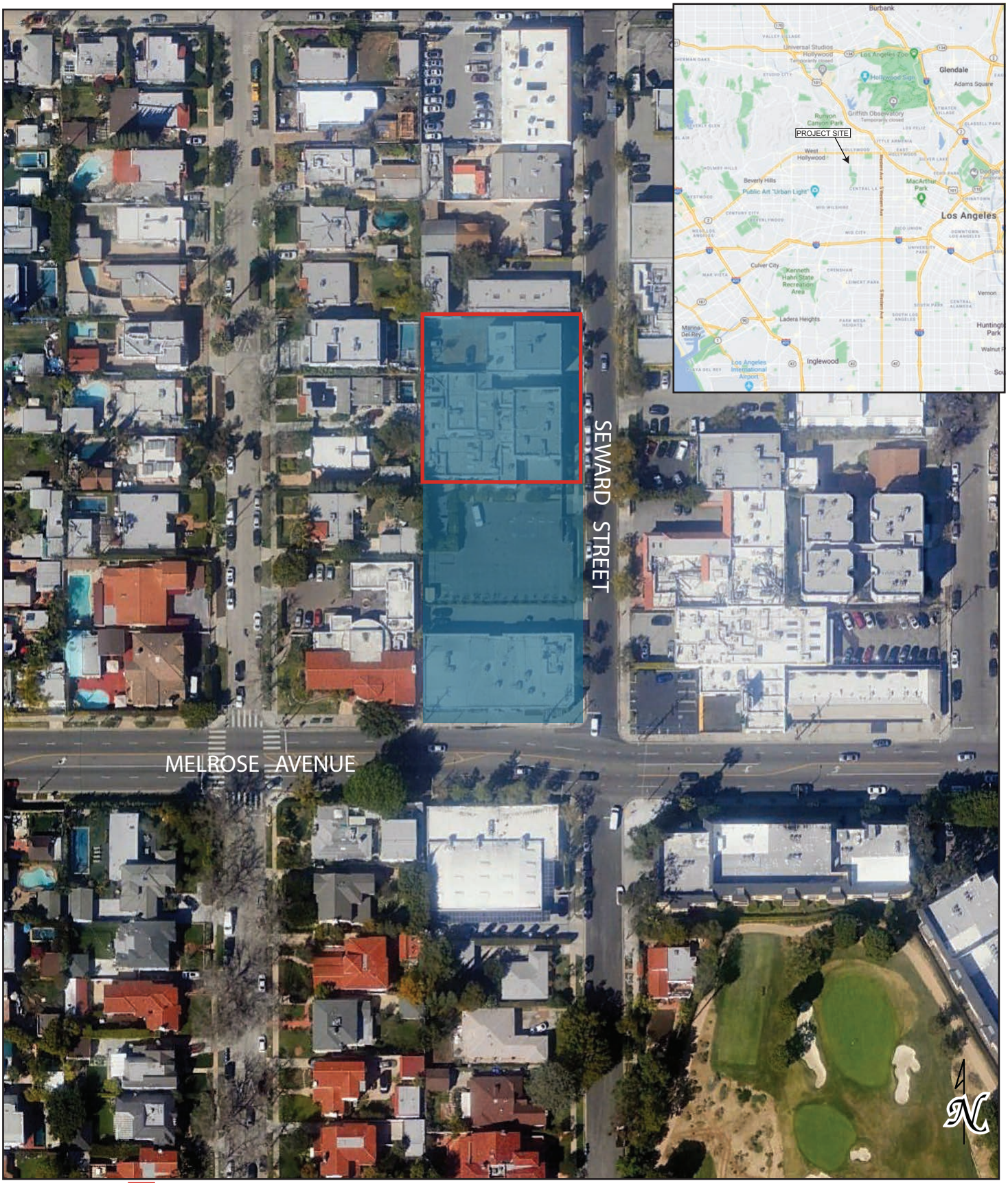
The Melrose and Seward Project proposes the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square foot, creative office building at the property located in the Hollywood Community Plan area at 6101-6117 West Melrose Avenue and 713-735 North Seward Street in the City of Los Angeles. The northernmost portion of the Project site includes two, two-story existing creative office buildings fronting North Seward Street, totaling approximately 17,134 square feet, that would be maintained as part of the project. The existing surface parking lot and existing one-story, approximately 8,473 square-foot commercial building fronting West Melrose Avenue would be demolished to allow for the location and construction of the new 67,889 square foot, creative office building proposed as part of the Project. The Project would provide 168 vehicular parking spaces and 26 bicycle spaces within a two level subterranean parking garage and an at-grade enclosed parking area. The Project would be built on a 45,136 square-foot lot, resulting in a site-wide FAR of approximately 1.88 to 1, inclusive of the existing buildings being retained as part of the Project. The Project's media-focused uses and forward-thinking post-pandemic design would continue and enhance the existing creative corridor along North Seward Street.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located within the boundaries of the Hollywood Community Plan, one of the 35 Community Plans which form the Land Use Element of the General Plan for the City of Los Angeles, all Project Site lots have been designated Commercial Manufacturing under the Hollywood Community Plan. The Project Site's location within the City of Los Angeles and greater Los Angeles region is depicted in Figure 3.1, *Regional and Vicinity Map*. The Project Site is located at 6101-6117 West Melrose Avenue and 713-735 North Seward Street, and is bounded by West Melrose Avenue to the south, by North Seward Street to the east, by the library and residential uses to the west and commercial buildings to the north.

Regional access to the Project Site is provided by the 101 Freeway, located approximately 2.0 miles east of the Project Site. Local access to the Project Site is provided via West Melrose Avenue and North Seward Street.



Project Site Existing Buildings to Remain

Source: GoogleEarth, November 2020.

Figure 3.1
Regional and Vicinity Map

3.2.2 Existing Conditions

Existing Site Conditions

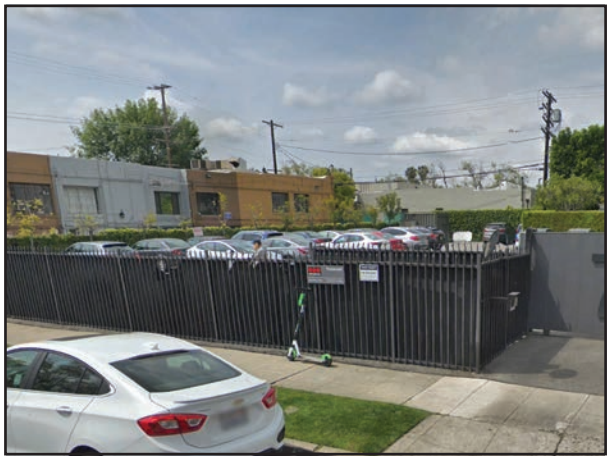
The Project Site is comprised of three parcels with Assessor Parcel Numbers (APN Nos. 5533-037-005, 5533-037-024, 5533-037-023) that are rectangular in shape and total 45,136 square feet in area. The relatively flat Project Site is currently developed with three buildings and two surface parking lots. As shown in Figure 3.2, *Existing Site Photos*, a one-story, approximately 8,473 square-foot commercial building is located on the southern portion of the Project Site. Adjacent and north of this building is a surface parking lot, which is accessed via one driveway off of North Seward Street. North of this surface parking lot is another gated surface parking lot, which is accessed via one driveway off of North Seward Street. North of the parking lot is a one- and two story creative office building, with a total of approximately 17,134 square feet of creative office space. The Project Site contains vegetation landscaping and six non-protected trees (two street trees and four trees located on-site). The Project would require the removal of the six existing non-protected trees: two existing street trees (Pittosporum undulatum/Victoria Box) and four courtyard trees (Cupaniopsis anacardioides/Carrotwood). Any existing street trees that will be removed through the development of the proposed Project will be replaced per the requirements of the Bureau of Street Services, Urban Forestry Division.

The Project Site is zoned C4-1XL and CM-1VL and is located within the Hollywood Community Plan Area, which designates the land use of the entire Project Site as Commercial Manufacturing. The portion of the Project Site that is located in Height District No. 1VL, restricts the height of development to 45 feet, three stories, and the portion of the Project Site that is located in Height District No. 1 XL, restricts the height development to 30 feet, two stories. The Site lots presently zoned CM-1VL are consistent with this designation, while the lot at the northwest corner of West Melrose Avenue and North Seward Street presently zoned C4-1XL is inconsistent with its Commercial Manufacturing land use designation under the Hollywood Community Plan as shown in Figure 3.3, *Zoning and General Land Use Designation*.

The Project Site is not located within the boundaries of or subject to any Specific Plan, Community Design Overlay, or Interim Control Ordinance. The Project Site is located in the Los Angeles State Enterprise Zone (ZI-2374), Hollywood Media District Business Improvement District, a Revised Hollywood Injunction (ZI-2433), and a Transit Priority Area in the City of Los Angeles (ZI-2452). The Project Site is not located within a Hillside Area or subject to Hillside Construction Regulation, Bureau of Engineering (BOE) designated Special Grading Area, Historic Preservation Review or Overlay Zone, a Clean Up-Green Up (CUGU) area. The Project Site is not located within a Very Hight Fire Severity Zone, Flood Zone, Watercourse, Hazardous Waste zone, a High Wind Velocity zone, a BOE Special Grading Area, Landslide area, Preliminary Fault Rupture Study Area, a Tsunami Inundation Zone, Liquefaction zone, or Alquist-Priolo zone. The Project Site is located within approximately 2.5 kilometers of the nearest fault, the Hollywood Fault. The Project Site is located within an Urban Agriculture Incentive Zone, however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. The Project Site is also located in a Methane zone.

View 1: View west toward the Project Site.

View 2: View west toward the Project Site.



View 3: View northwest toward the Project Site.

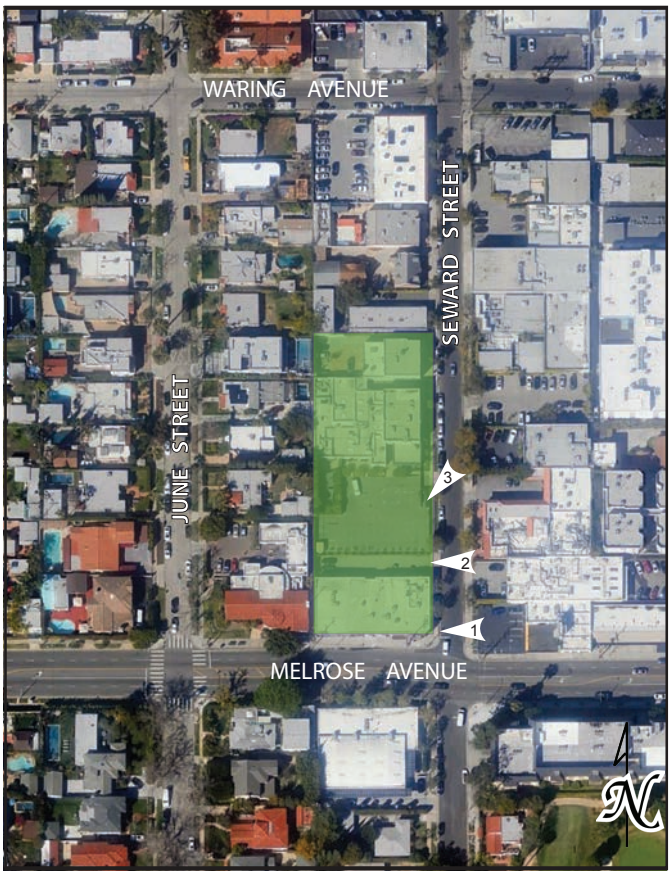
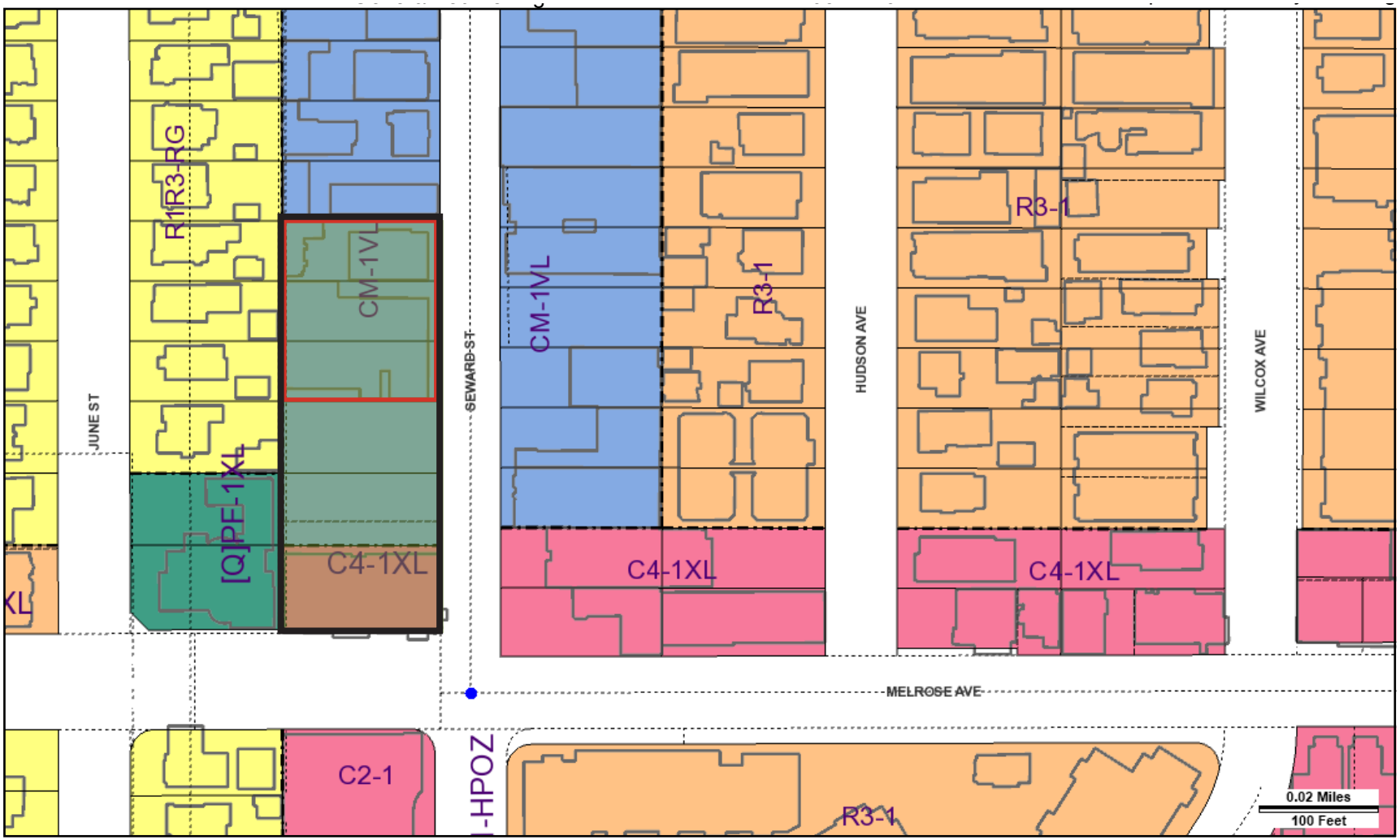


PHOTO LOCATION MAP

Source: EcoTierra 2021.

Figure 3.2
Existing Site Photos
View 1, 2 and 3



Project Site Existing Buildings to Remain

Source: City of Los Angeles Planning Zimas Maps, June 2021.

Figure 3.3
Zoning and General Plan Land Use Designation

3.2.3 Surrounding Land Uses

The Project Site is located in an urban area characterized by low to mid rise buildings. The Project Site is bounded by West Melrose Avenue to the south, by North Seward Street to the east, by the library and residential uses to the west and commercial buildings to the north.

Figures 3.4 and 3.5, *View of Surrounding Land Uses*, depict the existing conditions of the surrounding land uses. Surrounding land uses are comprised of office uses, residential uses, retail uses, and a library. Nearby structures vary in building style and construction.

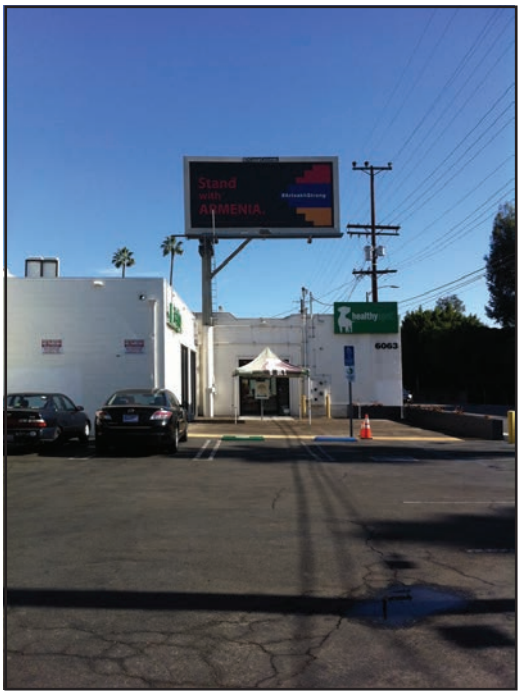
North: North of the Project Site are one and two-story office uses. The office uses are zoned CM-1VL with a General Plan land use designation of Commercial Manufacturing. Adjacent to the Project Site is Plus Development Group, and DV Warehouse Computer Store.

East: East of the Project Site across North Seward Street, is a surface parking lot, and one and two-story office uses. The office uses are zoned C4-1XL and CM-1VL with a General Plan land use designation of Commercial Manufacturing. Further east of surface parking lot is the Healthy Spot restaurant. Northeast of the parking lot and Healthy Spot restaurant is Irwin Entertainment, and Go Film, and Silva Artist Management offices.

South: South of the Project Site is West Melrose Avenue. Further south of the Project Site, directly across West Melrose Avenue is the one-story Aether Apparel retail use. The Aether Apparel site is zoned C2-1, with a General Plan land use designation of General Commercial. Southwest of the Project Site is a two-story apartment building. The apartment building is zoned R1-1-HPOZ with a General Plan land use designation of Low II Residential. Southeast of the Project Site is a three-story apartment building. The apartment building is zoned R3-1 with a General Plan land use designation of Medium Residential. Further southeast is the Wilshire Country Club Golf Course.

West: The John C. Freemont Library, and one-story residential uses are located adjacent and to the west of the Project Site. The John C. Freemont Library site is zoned [Q]PF-1XL, with a General Plan land use designation of Low II Residential. The area further northwest of the Project Site are one and two-story residential uses. These residential uses are zoned R1R3-RG with a General Plan land use designation of Low II Residential. West of the Project Site across June Street are one-and two story residential uses. These residential uses are zoned R2-1XL and R1R3-RG with a General Plan land use designation of Low Medium I Residential, and Low II Residential.

View 1: View northwest toward the office uses.



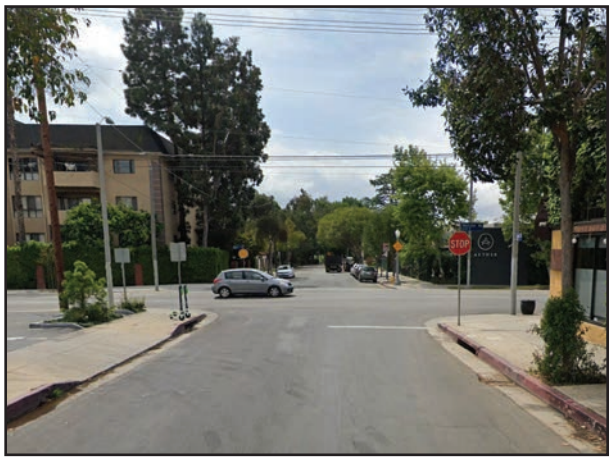
View 2: View east across Seward Street toward the Healthy Spot restaurant.

View 3: View northeast across Seward Street toward Irwin Entertainment.

PHOTO LOCATION MAP

Source: EcoTierra 2021.

Figure 3.4
Surrounding Land Uses
View 1, 2 and 3



View 4: View south across Melrose Avenue toward the apartment and Aether Apparel.

View 5: View east toward the John C. Freemont Library.

View 6: View northeast toward residential uses.

PHOTO LOCATION MAP

Source: EcoTierra 2021.

Figure 3.5
Surrounding Land Uses
Views 4, 5, and 6

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square foot, creative office building, as shown in Table 3.1, *Project Development Summary*. The northernmost portion of the Project site includes two, two-story existing creative office buildings fronting North Seward Street, totaling approximately 17,134 square feet, that would be maintained as part of the project. The existing surface parking lot and existing one-story, approximately 8,473 square-foot commercial building fronting West Melrose Avenue would be demolished to allow for the location and construction of the new 67,889 square foot, creative office building proposed as part of the Project. The proposed layout of the Project is illustrated in the floor plans in Figures 3.6 through 3.10. The elevation plans are shown in Figures 3.11 through 3.14.

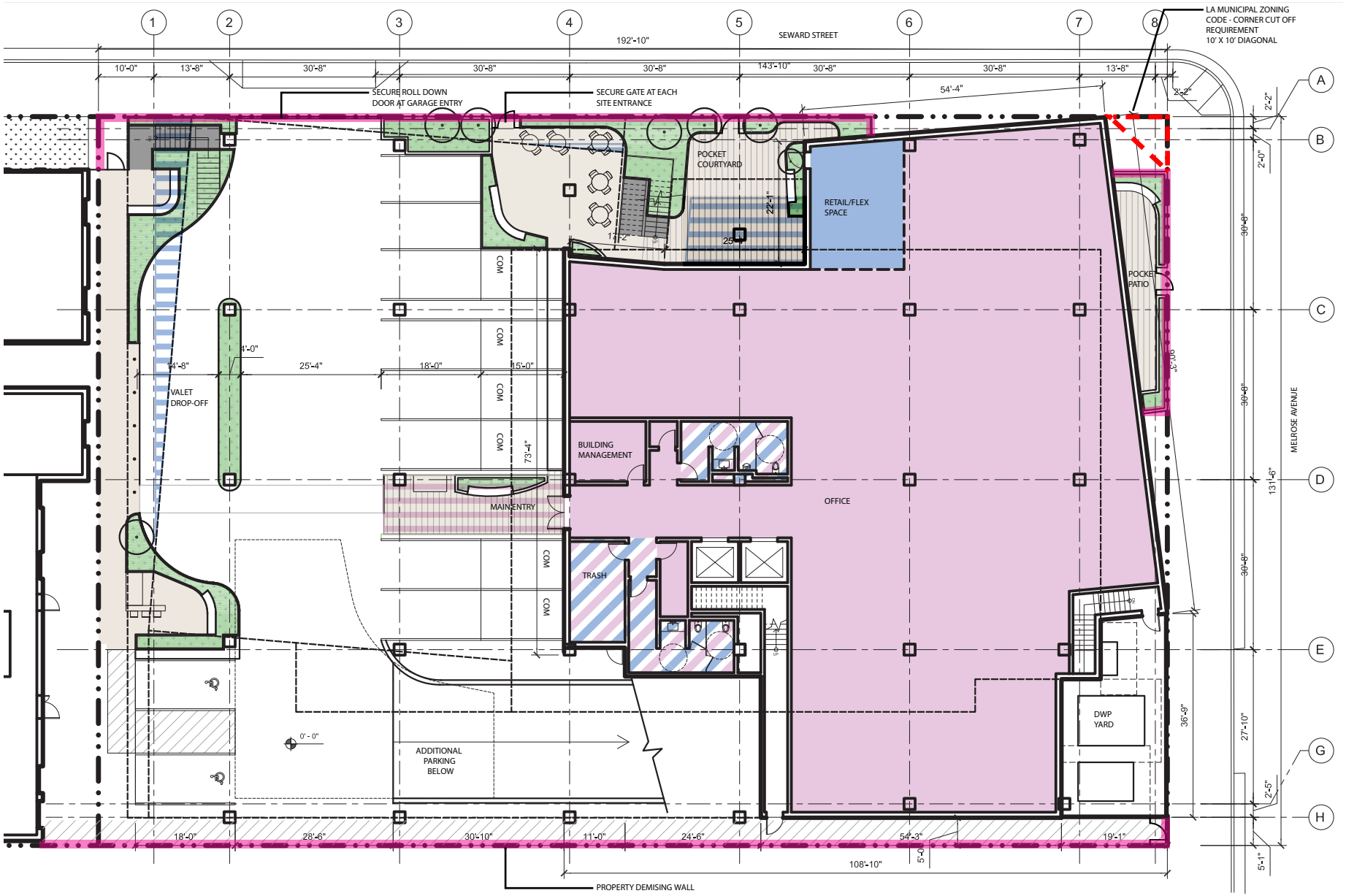
Table 3.1
Project Development Summary[a]

Size	Total
Creative Office Project	
Creative Office Use	*67,242 sf*
Retail Use	*647 sf*
Total Office Project Square Footage	**67,889 sf**
Parking Spaces	
Ground Floor	*16*
Subterranean Level 1	*42*
Subterranean Level 2	*110*
Total Parking Spaces	**168**
Bicycle Parking – Long Term	*9*
Bicycle Parking – Short Term	*17*
Total Bicycle Storage	**26**
Open Space	
Open Space	*11,325 sf*
Total Common Open Space	***11,325 sf***
Landscaping	
Landscaping	*2,870 sf*
Total Landscaping	***2,870 sf***

Notes:
sf = square feet
[a] *17,134 sf of existing uses to remain.*
Source: House & Robertson Architects October 2020.

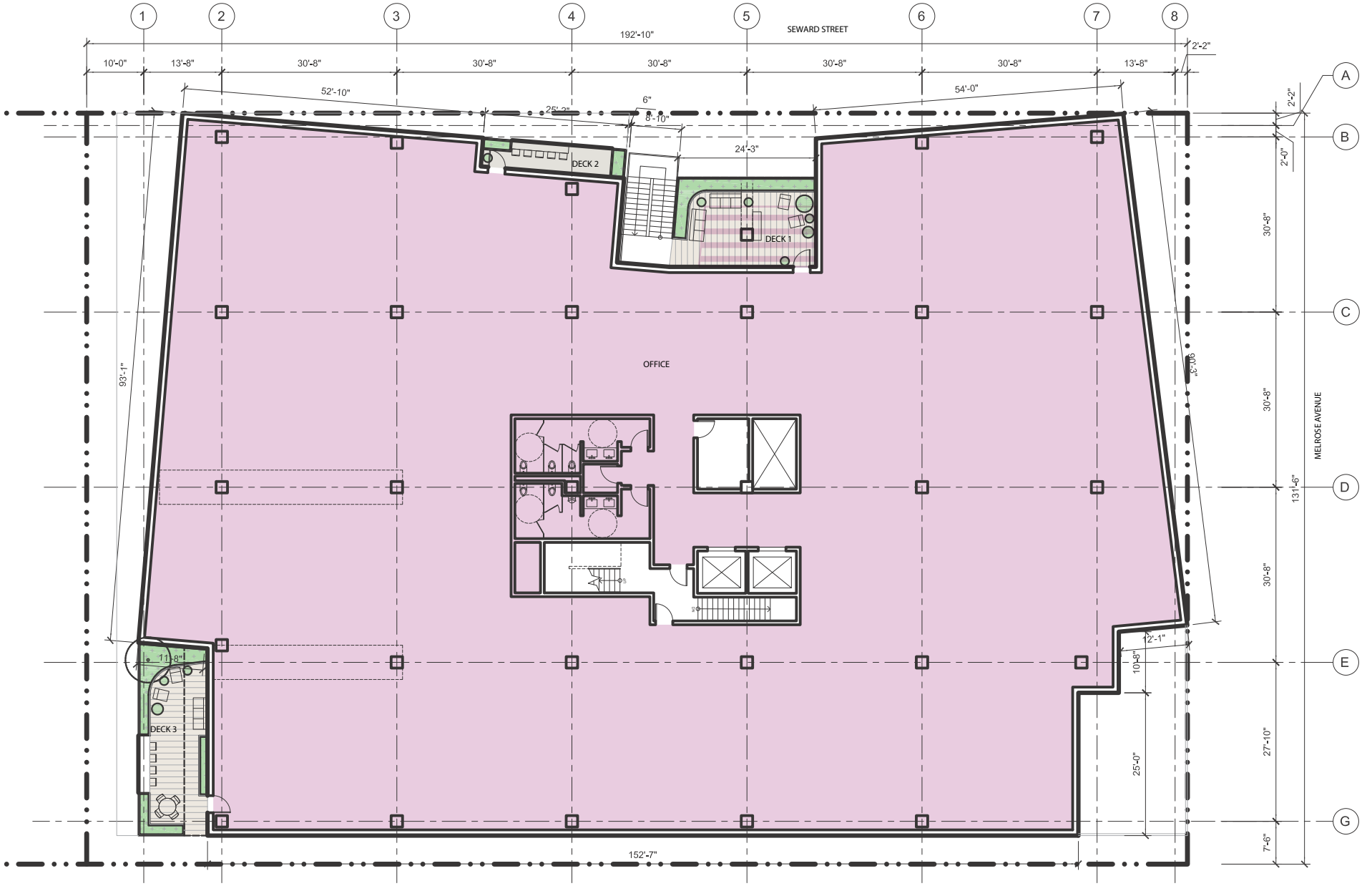
The building massing is comprised of two volumes atop a podium and stitched together with several planted decks and an east exterior exiting stairway. The west elevation terraces down to reduce the buildings massing along the neighboring residential lots.

The proposed subterranean parking garage is a two level below grade structure. The parking level one includes mechanical, electrical and plumbing rooms, bicycle parking spaces and vehicular parking spaces. The fire sprinkler tank, cistern, and heat pump room will be housed along the perimeter of parking levels one and two. Parking level two is dedicated to vehicular



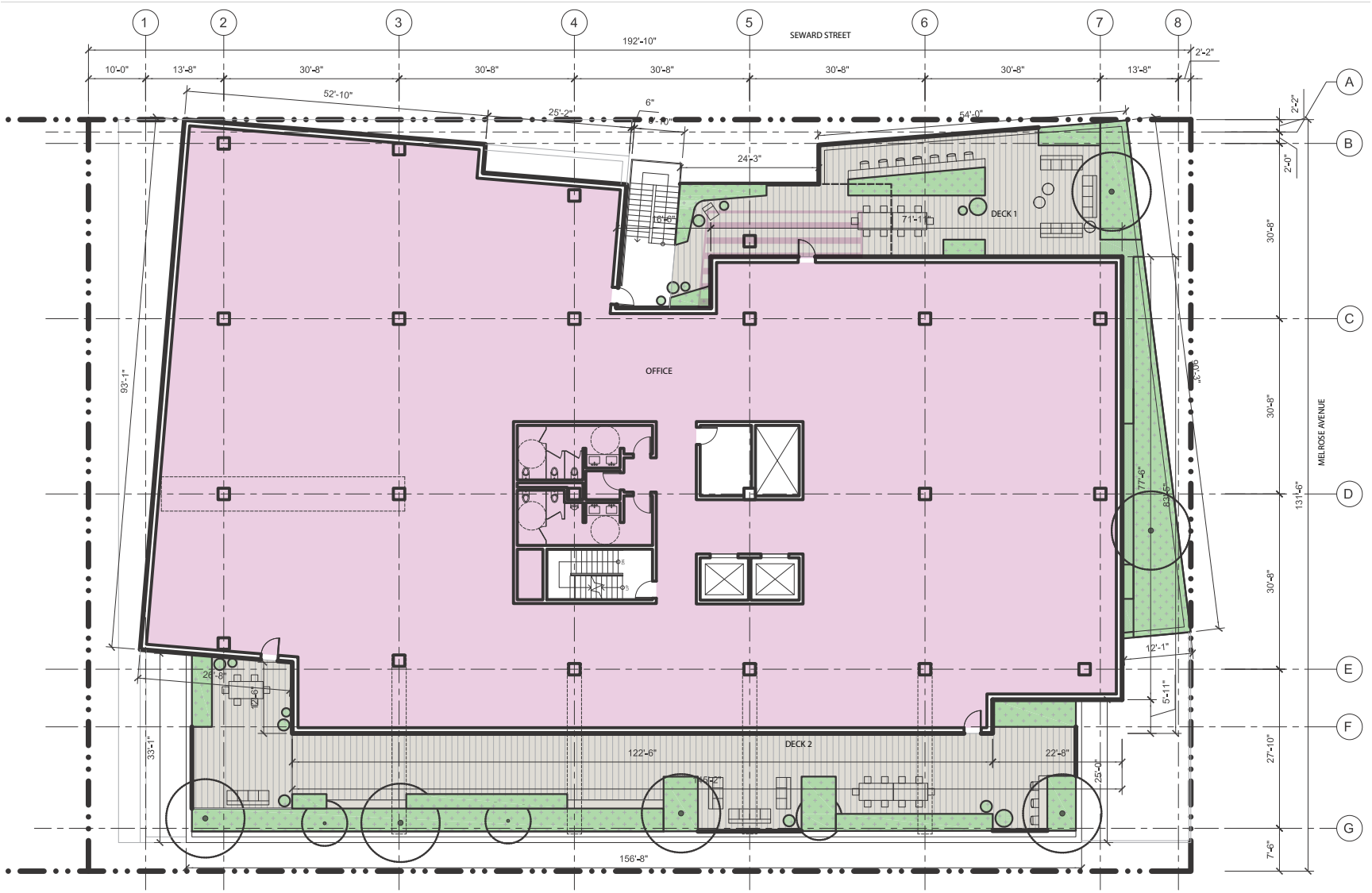
Source: HRA House & Robertson Architects, March 2021.

Figure 3.6
First Floor Plan



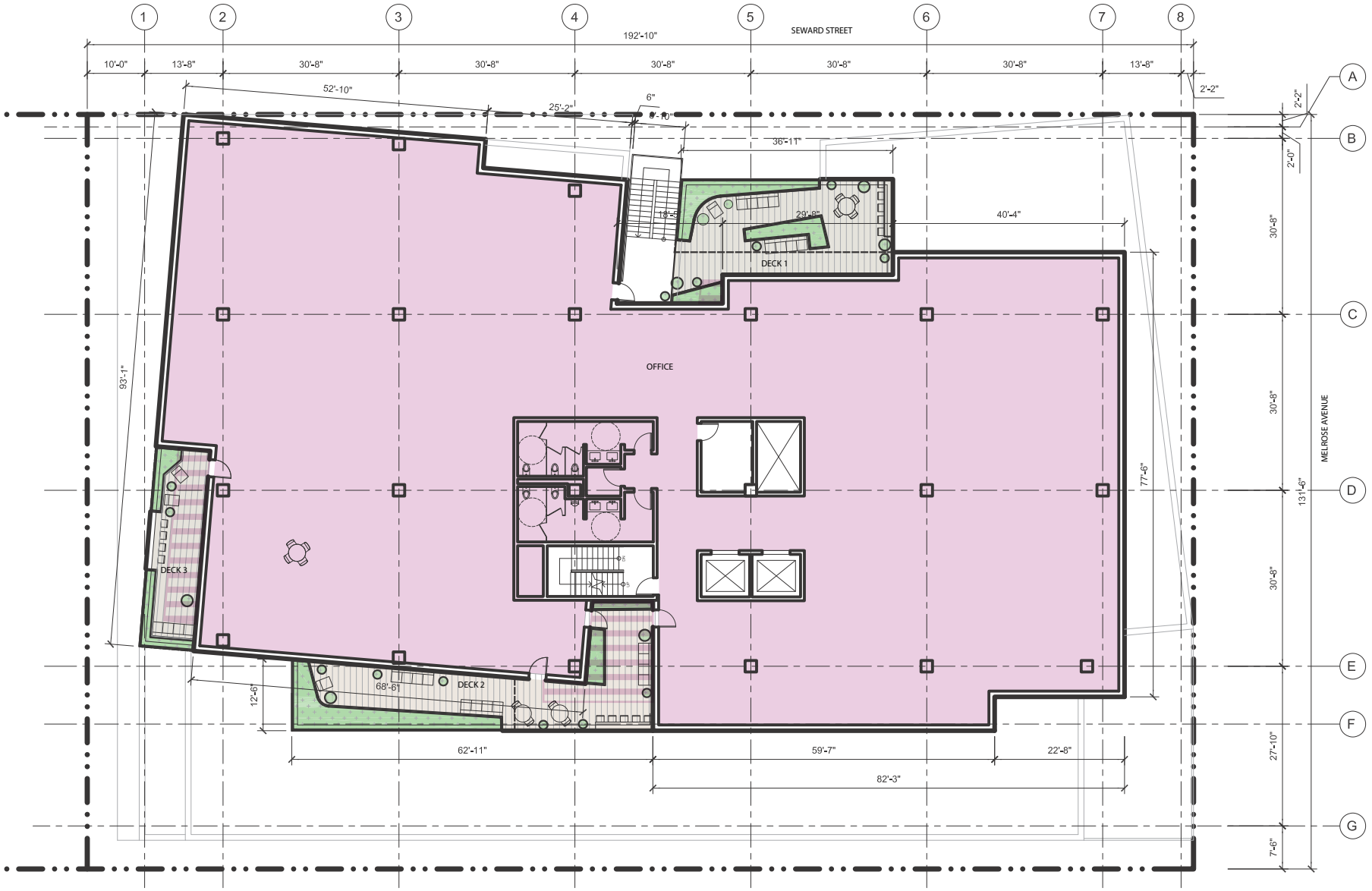
Source: HRA House & Robertson Architects, March 2021.

Figure 3.7
Second Floor Plan



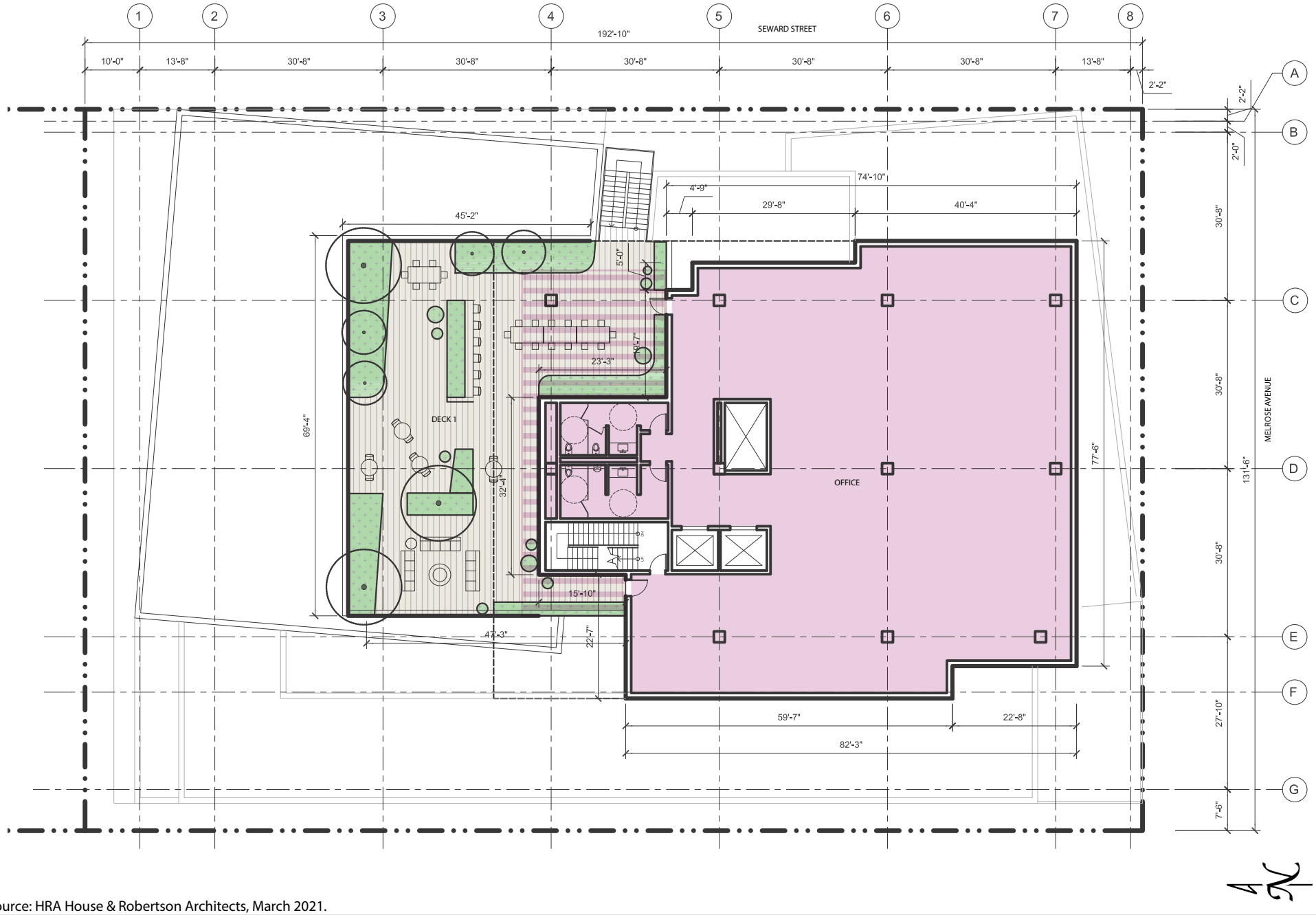
Source: HRA House & Robertson Architects, March 2021.

Figure 3.8
Third Floor Plan



Source: HRA House & Robertson Architects, March 2021.

Figure 3.9
Fourth Floor Plan

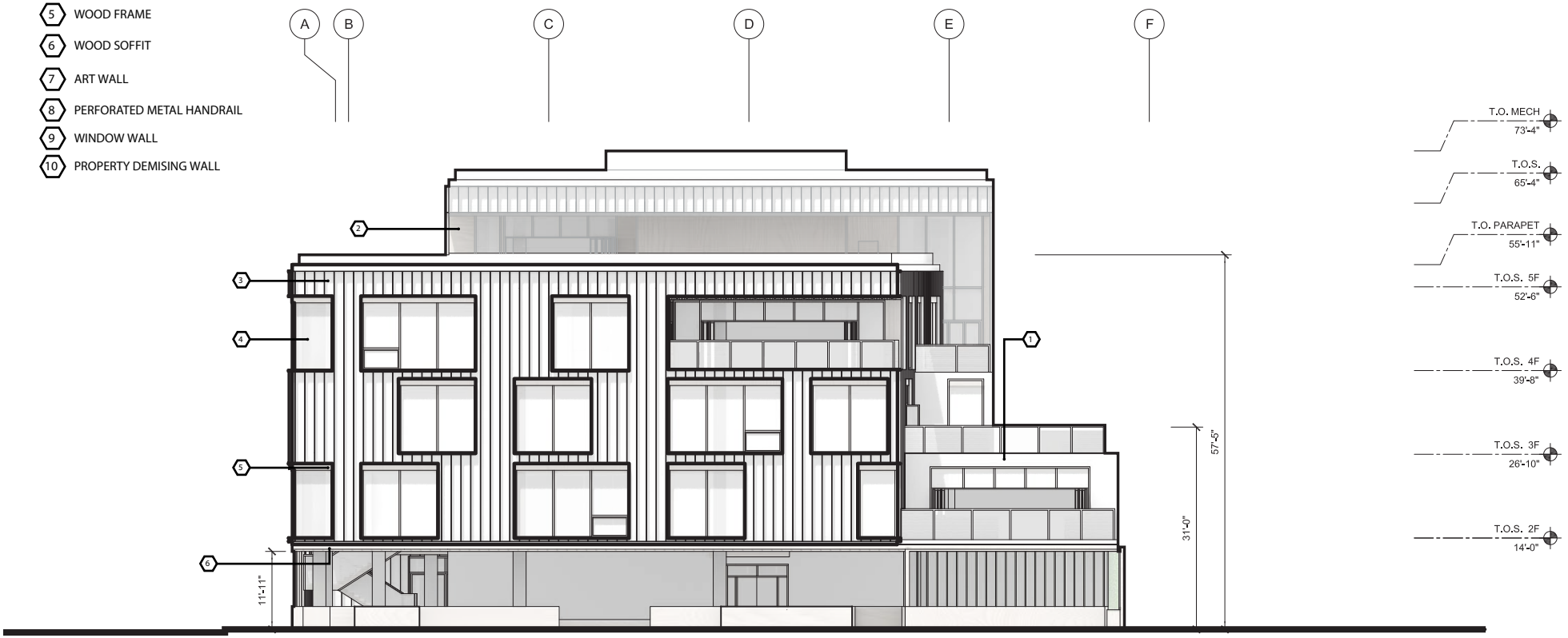


Source: HRA House & Robertson Architects, March 2021.

Figure 3.10
Fifth Floor Plan

KEYNOTES:

1. PAINTED STUCCO
2. WOOD PANELING
3. WHITE METAL PANEL
4. PUNCHED ALUMINUM WINDOW
5. WOOD FRAME
6. WOOD SOFFIT
7. ART WALL
8. PERFORATED METAL HANDRAIL
9. WINDOW WALL
10. PROPERTY DEMISING WALL

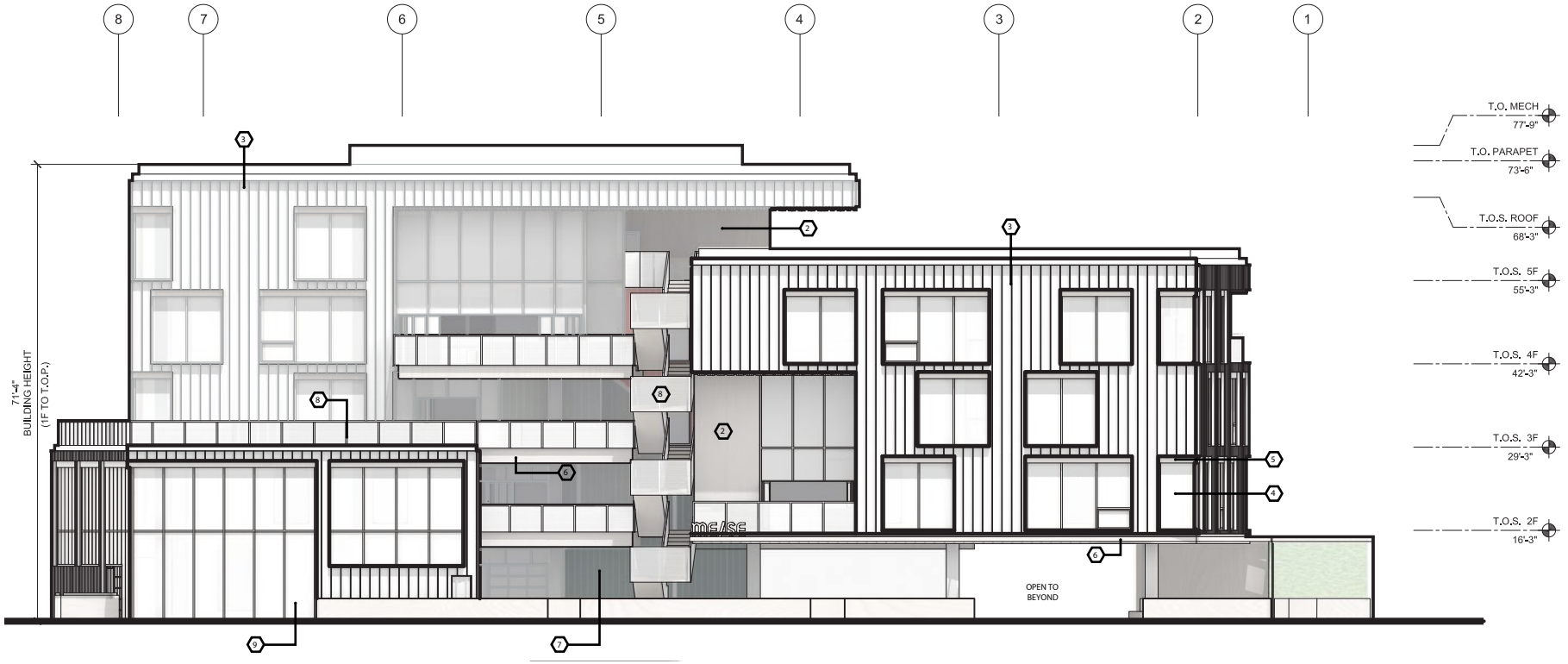


Source: HRA House & Robertson Architects, November 2020.

Figure 3.11
North Elevation

KEYNOTES:

1. PAINTED STUCCO
2. WOOD PANELING
3. WHITE METAL PANEL
4. PUNCHED ALUMINUM WINDOW
5. WOOD FRAME
6. WOOD SOFFIT
7. ART WALL
8. PERFORATED METAL HANDRAIL
9. WINDOW WALL
10. PROPERTY DEMISING WALL

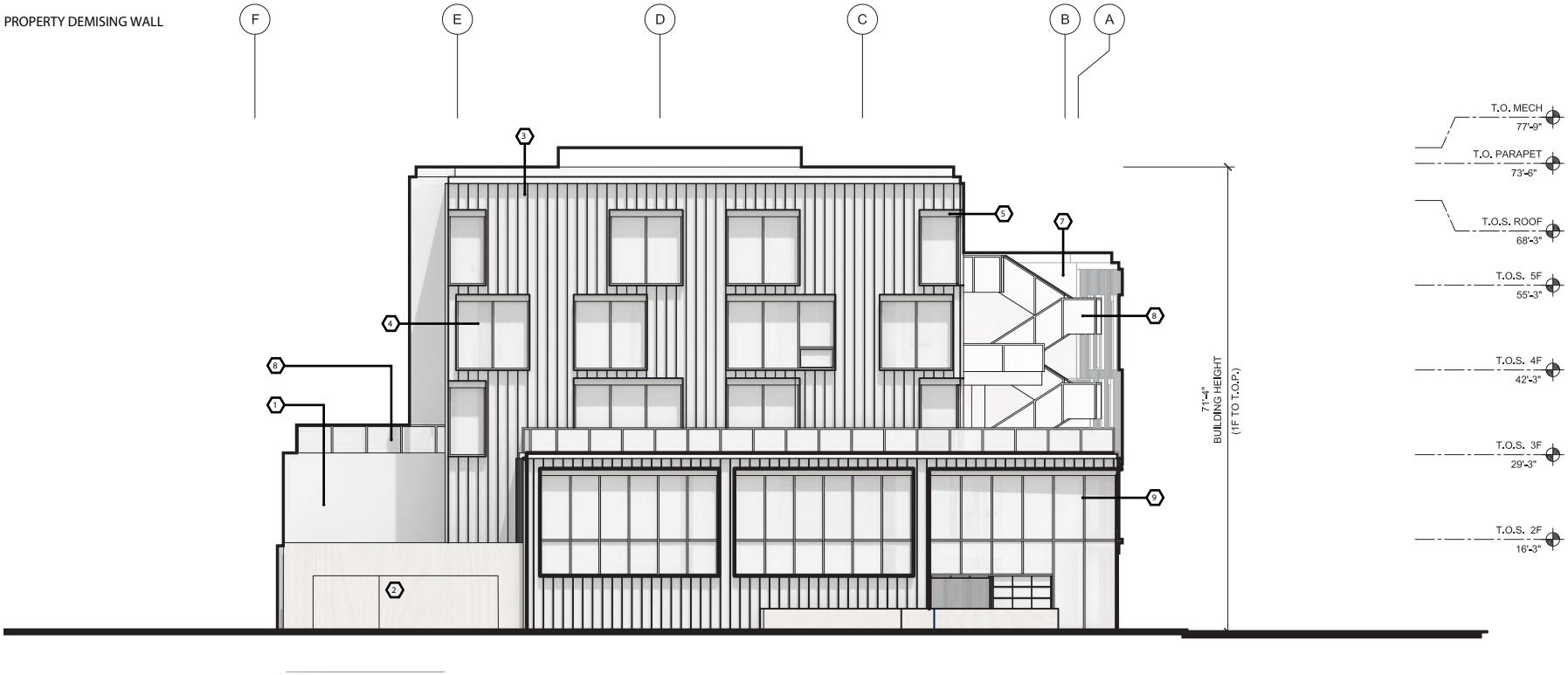


Source: HRA House & Robertson Architects, March 2021.

Figure 3.12
East Elevation

KEYNOTES:

1. PAINTED STUCCO
2. WOOD PANELING
3. WHITE METAL PANEL
4. PUNCHED ALUMINUM WINDOW
5. WOOD FRAME
6. WOOD SOFFIT
7. ART WALL
8. PERFORATED METAL HANDRAIL
9. WINDOW WALL
10. PROPERTY DEMISING WALL

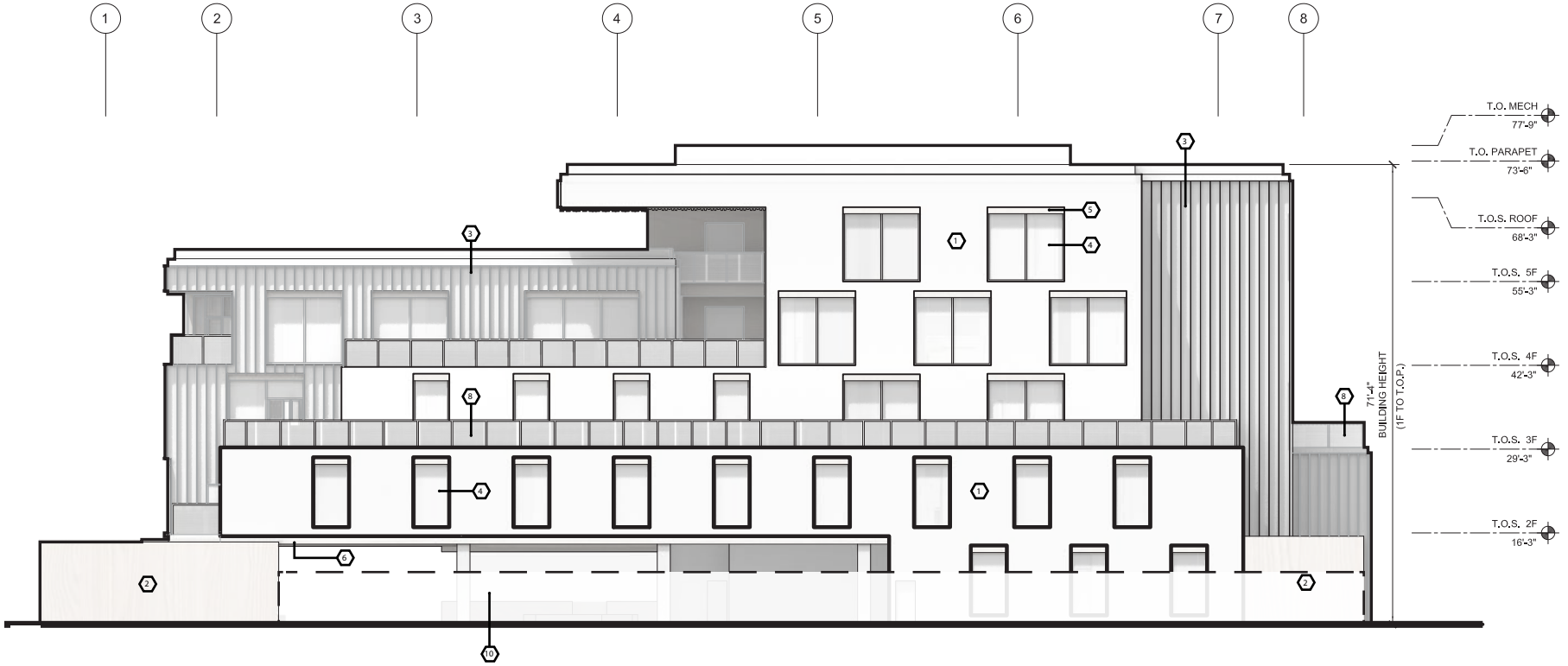


Source: HRA House & Robertson Architects, March 2021.

Figure 3.13
South Elevation

KEYNOTES:

1. PAINTED STUCCO
2. WOOD PANELING
3. WHITE METAL PANEL
4. PUNCHED ALUMINUM WINDOW
5. WOOD FRAME
6. WOOD SOFFIT
7. ART WALL
8. PERFORATED METAL HANDRAIL
9. WINDOW WALL
10. PROPERTY DEMISING WALL



Source: HRA House & Robertson Architects, March 2021.

Figure 3.14
West Elevation

parking spaces and includes mechanical parking stackers.

The proposed office building is located above the parking garage. The ground floor of the office building is composed of four primary elements: building lobby, 647 square-foot retail space, office space and service spaces. The retail space would be accessible only to tenants and their guests, and would not be open to the public. The lobby entrance is next to the surface parking and reception zone, near the center of the building. The secured lobby entrance is directly adjacent to the elevator lobby. Additional Project Site improvements include planting at grade along the facades on West Melrose Avenue and North Seward Street as well as on the upper level terraces and planting on the north side of the building in and near the shared plaza. This shared plaza between the Project and the existing creative office space to the north will be delineated from the surface parking and valet through plantings as well as ground pavers. Plantings along North Seward Street and West Melrose Avenue will connect the future tenant interior and exterior space. Core services, and mechanical, electrical, and plumbing systems complete the ground floor.

An exterior Los Angeles Department of Water and Power (LADWP) yard sits at the southwest corner of the building along West Melrose Avenue. The existing four-foot utility easement on the west side of the Project Site will be used for the buildings general exiting out to West Melrose Avenue and the building will be held back an additional foot providing a five-foot setback from the adjacent property.

Floors two through five of the office building are composed of a central core with perimeter lease spaces. Core program and spaces will be finished out as required for the initial leasing and code requirements. The building will have a structural concrete core with concrete floor assemblies. Exterior occupiable decks are located at various positions along the perimeter and at all levels. These decks connect to an exterior stair which will be utilized primarily for building exiting and inter-floor connections. The roof level includes the following equipment: required mechanical, electrical, plumbing, and building servicing equipment.

Zoning, Floor Area and Building Height

The Project Site is currently zoned C4-1XL and CM-1VL and is located within the Hollywood Community Plan Area, which designates the land use of the property as Commercial Manufacturing. The portion of the Project Site that is located in Height District No. 1VL, restricts the height of development to 45 feet, three stories, and the portion of the Project Site that is located in Height District No. 1 XL, restricts the height development to 30 feet, two stories. The Applicant has requested a Zone and Height District Change from C4-1XL and CM-1VL to CM-2 which would allow the Project to be developed with a FAR of 1.88:1 and to a maximum height of 77 feet 9 inches (73 feet 6 inches to the top of the parapet), five stories. As noted previously, the lot zoned C4-1XL located directly northwest of the intersection of West Melrose Avenue and North Seward Street is presently inconsistent with its Commercial Manufacturing land use designation under the Hollywood Community Plan. Therefore, the Zone Change would ensure that the Site's zoning is made consistent with the Site's land use designation.

3.3.2 Design and Architecture

The five-story creative office building, sits above the subterranean parking garage. The building massing is comprised of two volumes atop a podium and stitched together with several planted decks and an east exterior exiting stair. The west elevation terraces down to reduce bulk along the neighboring residential lots.

The building design includes use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements including painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall.

Project Site Improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of West Melrose Avenue. New street trees shall be provided in accordance with City recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division.

At its maximum height, the proposed building would be taller than the other building heights in the vicinity, however, the proposed design is compatible with the design elements of surrounding buildings, especially those with similar use. As stated above, the west elevation terraces down to reduce the buildings massing along the neighboring residential lots as shown in the Figures 3.11 through 3.14.

3.3.3 Open Space and Landscaping

Additional Project Site improvements to the Project Site include planting at grade along the facades on West Melrose Avenue and North Seward Street as well as on the upper level terraces, and planting on the north side of the building in and near the shared plaza. This shared plaza between the Project and the existing creative office space to the north will be delineated from the surface parking and valet through plantings as well as ground pavers. Planting along North Seward Street and West Melrose Avenue will connect the future tenant interior and exterior space.

Currently, the Project Site contains vegetation landscaping and six non-protected trees (two street trees and four trees located on-site). The Project would require the removal of the six trees: two existing street trees (Pittosporum undulatum/Victoria Box) and four courtyard trees (Cupaniopsis anacardioides/Carrotwood). Any street trees that will be removed through the development of the proposed Project will be replaced per the requirements of the Bureau of Street Services, Urban Forestry Division. There are no protected species or heritage trees. Pursuant to the LAMC, the existing trees will be replaced at a ratio of 2:1 with a minimum 24" box replacement tree (four trees). In addition, one tree per 500 square feet of planting area will be provided (8 trees per 3,797 square foot planting area). Thus a total of 12 trees will be provided as part of the Project. The Project will also provide 2,870 square feet of landscaping. Landscaping would be added to

the pocket courtyard, pocket patio, decks, and on West Melrose Avenue and at the North Seward Street entrance.

The Project will not be open to the public, thus no LAMC code required open space, recreational space is required. The Project will provide 11,325 square feet of non-required open space for the proposed tenants as part of a forward-thinking post-pandemic design intended to ensure worker safety and attract/retain media-focused tenants in Hollywood. This open space includes the pocket courtyard, pocket patio, and the decks.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site will be via a two-way entry/ exit driveway on North Seward Street. The Project will also include an at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations. The existing four-foot utility easement on the west side of the Project Site will be used to provide general egress to West Melrose Avenue.

Parking for the proposed office development would be provided on-site in a parking structure with one at-grade level, that would be enclosed, and two below-grade subterranean levels. As shown in Table 3.2, *Summary of Required and Proposed Vehicular Parking Spaces*, the Project is required to provide a total of 166 vehicular parking spaces. The Project will provide 168 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. The Project will provide approximately 16 spaces at in the at-grade level, with the balance of the parking being located in two below-grade levels accessed by internal vehicle ramps. As part of the 168 parking spaces, a total of 16 spaces would be designated for clean air vehicles, and 10 spaces would be designated for EV charging stations. Mechanical parking stackers will be provided on the second subterranean parking level. The Project parking is designed for managed parking at all levels (surface to the second underground level). The Project would be consistent with applicable parking requirements of the LAMC.

Table 3.2
Summary of Required and Proposed Vehicular Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			
Creative Office Use (including existing uses to remain)	*84,376 sf*	*2 per 1,000 sf*	*169*
Retail Use	*647 sf*	*1 per 200 sf*	*3*
		Required Total	**172**
		Parking Spaces Offset by Bicycle Spaces	**6**
		Minimum Required On-site Parking Spaces	**166**
Proposed			
Ground Floor			*16*
Subterranean Level 1			*42*
Subterranean Level 2			*110*
		Proposed Total	**168**

Notes:
sf = square feet
[a] *Pursuant to LAMC Section 12.21.*
Source: House & Robertson Architects October 2020.

As shown in Table 3.3, *Summary of Required and Proposed Bicycle Parking Spaces*, the Project is required to provide 26 bicycle parking spaces. The Project provide 9 short term bicycle parking spaces and 17 long-term bicycle parking spaces, located and configured in compliance with applicable requirements of the LAMC. One shower for each gender, and a total of 26 lockers, will be provided in the first level of the parking facility.

Table 3.3
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			
Bicycle Parking – Long Term	*84,376 sf*	*1 per 10,000 sf*	*9*
Bicycle Parking – Short Term	*84,376 sf*	*1 per 5,000 sf*	*17*
		Required Total	**26**
Proposed			
Bicycle Parking – Long Term	*84,376 sf*	*1 per 10,000 sf*	*9*
Bicycle Parking – Short Term	*84,376 sf*	*1 per 5,000 sf*	*17*
		Proposed Total	**26**

Notes:
sf = square feet
[a] *Pursuant to LAMC Section 12.21.*
Source: House & Robertson Architects October 2020.

3.3.5 Lighting and Signage

The exterior lighting will include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) to highlight key architectural features.

All outdoor lighting shall be shielded and down-cast within the site in a manner that prevents the direct illumination of adjacent properties and the night sky, unless otherwise required for other safety purposes as determined by the City of Los Angeles. The exterior lighting will include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and lighting of the feature exterior stair on the east-facing elevation.

The Project would include the following type of signage: monument signs, projecting signs, wall signs, illuminated architectural canopy signs, pole signs, roof signs and window signs. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with LAMC Section 14.4.4 E, illumination used for project signage would be limited to a light intensity of 3-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

3.3.6 Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, security would be provided via site planning and secured access points of entry. The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles

Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to the use of security cameras, access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

3.3.7 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC). The LAGBC requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. LAGBC contains both mandatory and voluntary green building measures to conserve energy.

The Project will include enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system will be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems will include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls will enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair will further enhance the health and wellness of the occupants.

Water usage will be minimized via the use of ultra-low flow plumbing fixtures throughout the project. All roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern, approximately 10,000-gallon capacity, to be used entirely for irrigation of the on-site landscaping.

The irrigation system shall be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system should utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas will include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Irrigation valves shall be located in inconspicuous areas, and shall be parallel to adjacent structures and paving, with quick coupling valves spaces a minimum 100 feet on center.

The on-site drop-off area in the ground floor will encourage ridesharing and carpooling, while the on-site parking will include preferential parking for electric and low-emitting vehicles, and the Project will provide over-code electric vehicle charging stations. The proposed Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space. As further described in the Energy Use Analysis section in the IS/MND, below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the proposed Project's energy consumption.

3.3.8 Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 20-22 months, with construction beginning April 2022 and final buildout occurring in February 2024. Construction activities would be undertaken in four main steps: (1) demolition; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M on any Saturday or national holiday. No construction activities are permitted on Sundays.

Temporary shoring with tie backs or rakers will be used for excavation of the garage. Approximately 29,400 cy of soil will be excavated and removed from the Project Site. In addition, approximately 2,000 truck trips (assuming 14 cy/load) will be required for export.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study and Negative Declaration/Mitigated Negative Declaration analyzes impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- **Zone Change and Height District Change.** Pursuant to Los Angeles Municipal Code ("LAMC") Section 12.32, the Applicant seeks a Zone Change and Height District Change as follows:
    - Lot located at the northwest corner of West Melrose Avenue and North Seward Street (6101-6117 West Melrose Avenue): From C4-1XL to CM-2.
    - All other Project Site lots (713-733 North Seward Street): From CM-1VL to CM-2.
- **Site Plan Review.** Pursuant to LAMC Section 16.05, the Applicant seeks Site Plan Review to allow the redevelopment of the Project Site with more than 50,000 square feet of nonresidential floor area.
- **Zoning Administrator's Adjustment.** Pursuant to LAMC Section 12.24-X.22, the Applicant seeks a Zoning Administrator's Adjustment to allow the Project to exceed the maximum transitional height requirements otherwise required by LAMC Section 12.21.1-A.10.
- **Waiver of Dedication and/or Improvement.** Pursuant to LAMC Section 12.37 I.3, to waive all dedication and street widening requirements along North Seward Street and West Melrose Avenue.

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

RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- Los Angeles Regional Water Quality Control Board, and
- South Coast Air Quality Management District.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[2]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study

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

(or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

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

No Impact. A significant impact may occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. Scenic vistas are generally described in two ways: (1) panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and (2) focal views (visual access to a particular object, scene, or feature of interest).

The 45,136 square-foot Project Site is currently developed with the existing one-story, approximately 8,473 square-foot commercial building and surface parking lot. The Project Site is surrounded by other development, is predominately flat, and is not located within a Hillside Area. The existing viewshed at the Project Site is defined by existing urban development with commercial, residential structures, and a library. Only distant views of hills are available looking north from Melrose Avenue and Seward Street. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed, nor does the Project Site contain a scenic vista. **The Project would not directly obstruct an existing public view of a scenic**

vista as no scenic vistas are near the Project Site vicinity. Therefore, no impacts would occur and no mitigation measures are required.

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

No Impact. A significant impact may occur only where scenic resources would be damaged or removed by the project. There are no State-designated scenic highways in the Project Site vicinity. The nearest eligible (not designated) State scenic highway to the Project Site is Mulholland Drive, which is also a City designated Scenic Highway.[3] Mulholland Drive is over 4.9 miles to the northwest of the Project Site. **Therefore, the Project would not have an impact on scenic resources or historic buildings within a State scenic highway. Therefore, no impacts would occur and no mitigation measures are required.**

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 publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact may occur if, in a non-urbanized area, the project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, the project would conflict with applicable zoning or regulations governing scenic quality. The Project is located in a highly urbanized area in the Hollywood community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would involve the demolition of the existing one-story building and surface parking lot, and the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square foot, creative office building. Thus, the Project would result in a change in the visual character of the Project Site.

Zoning Consistency

The LAMC establishes the zoning for the Project Site as C4-1XL and CM-1VL and is located within the Hollywood Community Plan Area, which designates the land use of the property as Commercial Manufacturing. The portion of the Project Site that is located in Height District No. 1VL, restricts the height of development to 45 feet, three stories, and the portion of the Project Site that is located in Height District No. 1 XL, restricts the height development to 30 feet, two stories. The Project Site lots that are presently zoned CM-1VL are consistent with this designation, while the lot at the northwest corner of West Melrose Avenue and North Seward Street presently zoned C4-1XL is inconsistent with its Commercial Manufacturing land use designation under the Hollywood Community Plan. The Project Site is located in the Los Angeles

[3] *California Department of Transportation (Caltrans) Scenic Highway System List. City of Los Angeles Department of City Planning, Mobility Plan 2035, Map A2 and Appendix B: Inventory of Designated Scenic Highways and Guidelines, December 2015.*

State Enterprise Zone (ZI-2374), a Revised Hollywood Injunction (ZI-2433), and a Transit Priority Area in the City of Los Angeles (ZI-2452).

The Project Site is located in a neighborhood developed with a mixture of office uses, residential uses, retail uses, and a library, all of which are constructed with a variety of styles and materials including stucco, and a variety of sizes of glass windows.

The Project is composed of a five-story creative office building built above a subterranean garage. The building massing is comprised of two volumes atop a podium and stitched together with several planted decks and an east exterior exiting stairway. The west elevation terraces down to reduce the buildings massing along the neighboring residential lots.

The building design includes use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements these include painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall.

Project Site improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of West Melrose Avenue. New street trees shall also be provided in accordance with City recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division.

At its maximum height of five stories, the proposed building would be taller than the other building heights in the immediate vicinity, including the one-and two-story office uses located to the north of the Project Site, the two-story apartment building located to the southwest of the Project Site, and the three-story apartment building located to the southeast of the Project Site. However, the proposed design is compatible with the design elements of surrounding buildings, especially those with similar use. As stated above, the west elevation terraces down to reduce the buildings massing along the neighboring residential lots as shown in the Figures 3.11 through 3.14.

Although the Project would exceed the existing height, and would be inconsistent with existing zoning on the Site, the Applicant seeks a zone change and height district change. Pursuant to LAMC Section 12.32, the lot located at the northwest corner of West Melrose Avenue and North Seward Street (6101-6117 West Melrose Avenue) is proposed to change from C4-1XL to CM-2. All other Project Site lots (713-733 North Seward Street) are proposed to change from CM-1VL to CM-2. Furthermore as the west elevation terraces down to reduce the buildings massing along the neighboring residential lots, the Project would be consistent with the buildings in the area in terms of having a lower height near the residential uses and the taller portions of the building near the commercial uses.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed buildings, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would

not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

Other Regulations Governing Scenic Quality

The Project Site is located in the Hollywood-Community Plan area. The Community Plan includes Policy 6.7: "Provide height transitions between established single-family neighborhoods and adjacent multi-family, and commercial areas" and policy 6.8: "Encourage smooth transitions in scale, form, and character by regulating the setback, stepbacks, rear elevations, and landscaping of new development adjacent to residential districts."

The Project is composed of a five-story creative office building built above a subterranean garage. The building massing is comprised of two volumes atop a podium and stitched together with several planted decks and an east exterior exiting stairway. The west elevation terraces down to reduce the buildings massing along the neighboring residential lots.

As stated above, the building design includes use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements these include painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall.

Project Site improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of West Melrose Avenue. In addition, new street trees shall be provided in accordance with City recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division.

At its maximum height, the proposed building would be taller than the other building heights in the immediate vicinity, however, the proposed design is compatible with the design elements of surrounding buildings, especially those with similar use. As stated above, the west elevation terraces down to reduce the buildings massing along the neighboring residential lots as shown in the Figures 3.11 through 3.14.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Furthermore, per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if the development introduces new sources of light or glare on or from a project site which adversely affect day or nighttime views in the area.

Construction

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction lighting would be to increase the overall ambient glow emanating from the Project Site. Per the requirements of the LAMC, construction hours would be limited to 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. As such, Project construction lighting would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. **Therefore, less than significant impacts would occur related to construction lighting.**

Operation

Light

The Project is located in a well-lit area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. West Melrose Avenue is a major thoroughfare with four lanes of traffic and includes lighted commercial signage along its length in this area.

The streets in these areas are lit using city standard streetlights. The Project Site is located within an urban environment, thus, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As land uses surrounding the Project Site are already lit from existing development in the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would increase lighting effects compared to the existing uses on the Project Site. There are several sensitive use receptors near the Project Site that could be susceptible to light impacts created by the Project. Sensitive uses are defined by LAMC Chapter IX, Article 3, Section 93.0117 as any exterior glazed window or sliding glass door on any other property containing a residential unit or units, elevated habitable porch, deck, or balcony on any other property containing a residential unit or units, or any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units. Office, warehouse, manufacturing, commercial, and institutional uses are not considered light sensitive uses because they are generally not in use during the evening hours, although many of these uses maintain interior, exterior, and/or landscape lighting during the late hours for maintenance and security purposes.

The light-sensitive uses in the vicinity include the three-story multi-family residential building located directly across West Melrose Avenue from the Project Site and the single-family residential uses to the west of the Project Site, on North June Street.

The Project is designed with windows and office lighting. The exterior lighting will include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) to highlight key architectural features.

All exterior lighting would meet all applicable LAMC standards and would be shielded or directed toward the areas to be illuminated. The exterior lighting will include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature on the exterior stair on the east-facing elevation) to highlight key architectural features. With compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties.

The Project would include the following type of signage: monument signs, projecting signs, wall signs, illuminated architectural canopy signs, pole signs, roof signs and window signs. Low-level lighting would be provided throughout the Project Site for security and would include identity signage for the office. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with LAMC Section 14.4.4 E, illumination used for project signage would be limited to a light intensity of 3-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. Therefore, the perception of Project lighting sources would be similar to that already provided by the surrounding buildings. Although additional lighting sources associated with the Project could add to the ambient glow of the Project Site and immediately surrounding uses, the area along West Melrose Avenue is already characterized by moderate to high ambient light levels consistent with an urban area.

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. However, with compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties, nor would they represent a substantial change in the lighting environment of the Project Site and surrounding area. As such, Project lighting would not result in substantial changes to existing artificial light conditions and would not interfere with off-site activities. **Therefore, impacts related to Project interior and exterior light sources would be less than significant.**

Glare

The Project would incorporate both solid and glass surfaces. The proposed Project building would be prohibited from the using highly reflective building materials such as mirrored glass on exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future. As such, the Project would not include elements that incorporate substantial amounts of reflective building materials in areas that are highly visible to off-site glare-sensitive uses. Exterior building materials would use various non-reflective material designed to minimize the transmission of glare from building. **Therefore, impacts related to daytime glare would be less than significant.**

Based on the above, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore impacts would be less than significant and no mitigation measures are required.

II. AGRICULTURE AND FOREST RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The Project Site is developed with a commercial building and two surface parking lots and is located in a developed area of the City. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[4] **Thus, the Project would not result in the loss of State-**

[4] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published 2018.*

designated Farmland. Therefore, no impacts would occur, and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use. The Project Site is zoned C4-1XL and CM-1VL and has a General Plan land use designation of Commercial Manufacturing. Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. The Site is located within an Urban Agriculture Incentive Zone; however, the proposed Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract. **Therefore, no impacts would occur, and no mitigation measures are required.**

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. There are no forest or timberland resources on this fully developed site that is in an urbanized part of the City.

In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned C4-1XL and CM-1VL and has a General Plan land use designation of Commercial Manufacturing. The Project Site is not zoned for forest land, timberland, or timberland production land uses. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project results in the conversion of forest land to another, non-forest use. The Project Site is developed with a commercial building and two surface parking lots and is located in a developed area of the City. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. The Project Site is previously developed and located in an urbanized area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or

within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. **Therefore, no impacts would occur, and no mitigation measures are required.**

III. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air quality data was generated for the Project to assist in the preparation of the following air quality analysis and is included as Appendix A to this document.

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the National Ambient Air Quality Standard (NAAQS) (e.g., ozone, particulate matter ($PM_{2.5}$), and PM_{10}). The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from Southern California Association of Governments' (SCAG's) 2016 and 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) designed to focus growth near High Quality Transit Areas (HQTAs) and to reduce vehicle miles traveled (VMT).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG

is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The California Air Resources Board (CARB) is the lead agency for climate change programs and oversees all air pollution control efforts in California to attain and maintain health-based air quality standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG. As the AQMP control strategy is based on projections from local General Plans, projects which are consistent with local General Plans are considered consistent with the growth assumptions of the air quality related regional plans and their emissions are assumed to be accounted for in the AQMP emissions inventory. Projects which include amendments to General or Specific Plans, or are considered significant projects, undergo further scrutiny for AQMP consistency. As noted above, the 2016 AQMP has been adopted by the SCAQMD and CARB. Therefore, this analysis considers the Project's consistency with the 2016 AQMP.

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's *CEQA Air Quality Handbook,*[5] the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
    - An increase in the frequency or severity of existing air quality violations;
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or

[5] *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.*

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

The Project's impacts with respect to these criteria are discussed to assess the consistency with SCAQMD's AQMP.

Consistency Criterion No. 1: The 2016 AQMP, discussed previously, was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment of the AQMP's goals. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project will not result in an increase in the frequency or severity of existing air quality violations 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.

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards ("CAAQS") and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds ("LSTs") or regional significance thresholds were exceeded. The Project would not exceed the applicable LSTs or regional significance thresholds for construction activity (see discussion below under Questions 3(b), 3(c), and 3(d)). **Therefore, the Project would not conflict with the AQMP according to this criterion.**

Operational Impacts

The Project would not exceed the applicable LST or regional significance thresholds for operational activity (see discussion below under Questions 3(b), 3(c), and 3(d)). Therefore, the Project would not conflict with the AQMP according to this criterion.

On the basis of the preceding discussion, the Project is consistent with the first criterion.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Overview

Consistency with the AQMP assumptions is determined by performing an analysis of the Project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the Project are based on the same forecasts as the AQMP. The 2016-2040 RTP/SCS includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA.

On September 1, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020–2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[6] The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these criteria.

As discussed in Section 4.IX, Land Use, the proposed Project would not exceed the population and housing projections of the 2020-2045 RTP/SCS for the Los Angeles subregion, and would therefore be consistent with the assumptions utilized in preparing the AQMP.

Regarding feasible air quality mitigation measures, the proposed Project does not have significant impacts that require mitigation as shown in Appendix A. Additionally, the proposed Project would comply with applicable regulatory measures enforced by the SCAQMD. SCAQMD enforces stationary and mobile source compliance with respect to both operational and construction emissions. The proposed Project would adhere to current and applicable regulatory compliance measures (including SCAQMD Rule 403: Fugitive Dust and Rule 1113: Architectural Coating). As such, the proposed Project is consistent with this criterion. No mitigation measures are required to meet SCAQMD air quality thresholds.

With respect to land use policies set forth in the AQMP, the proposed Project would implement several land use policies and strategies listed in the RTP/SCS and the AQMP. Such land use strategies set forth in the 2016 AQMP that are applicable to the proposed Project include planning for growth around livable corridors, providing more options for short trips/neighborhood mobility areas, expanding electric vehicle charging stations, supporting local sustainability planning, and balancing growth distribution between 500-foot buffer areas and HQTAs. The proposed Project would provide a variety of land uses, including creative office space and a retail/coffee shop, which would help reduce vehicle miles traveled by promoting internal capture trips and would balance growth distribution within HQTAs. The Project Site is currently zoned C4-1XL, and CM-1VL and has a General Plan land use designation of Commercial Manufacturing in the Hollywood Community Plan.

The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by

[6] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

the Project Site's location within a SCAG-designated HQTA and TPA, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. As such, the Project is an appropriate location for the proposed uses and would serve the local community's demand for creative office space and retail. Thus, the proposed Project would be compatible with the existing established land uses in the Project area. The proposed Project office use would generate a limited number of employees on-site due to the size of the creative office spaces, which would not allow for operation of a business employing large numbers of people to work on-site. Neither the retail or office use would induce population growth due to employment on the site. The Project's estimated employment growth projections would not conflict with SCAG's future growth projections for the City of Los Angeles.

Additionally, the proposed Project would include sustainability features that are further discussed in Section 3.3, Project Description. Sustainability features of the proposed Project include development of a creative office/retail coffee shop that will meet or exceed California's Building Energy Efficiency Standards (Title 24). The proposed Project would be designed to meet the minimum energy efficiency standards of the Los Angeles Green Building Code. Further consideration regarding energy efficiency and sustainability will include use of ultra-low flow plumbing fixtures throughout the Project. All roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern, approximately 10,000-gallon capacity, to be used entirely for irrigation of the on-site landscaping. The irrigation system shall be designed to meet or exceed the state MWELO. The system should utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. The on-site drop-off area in the ground floor will encourage ridesharing and carpooling, while the on-site parking will include preferential parking for electric and low-emitting vehicles, and the Project will provide over-code electric vehicle charging stations.

In addition, regarding land use developments, such as the proposed Project, SCAG's 2016/2020 RTP/SCS land use goals and policies focus on the reduction of vehicle trips and VMT. Per the City's Traffic Assessment Guidelines (TAG), projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and greenhouse gases (GHG) goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2016/2020 RTP/SCS and would have a less-than-significant cumulative impact on VMT. As the Project would generate a total of 481 net daily trips, the Project would not result in any significant VMT transportation impacts. Therefore, the Project is consistent with the RTP/SCS. Additionally, it should be noted that the goals and policies of the recently adopted 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the proposed Project would be consistent with the 2016– 2040 RTP/SCS as discussed above, the proposed Project would also be consistent with the 2020–2045 RTP/SCS.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the proposed Project on air quality in the Air Basin. The proposed Project is an infill development near transit within an existing urbanized area that would concentrate new creative office/retail uses within an HQTA, thus reducing VMT. The proposed Project would not have a significant long-term impact on the region's ability to meet State and federal air quality standards. As discussed above, **the proposed Project would be consistent with the growth assumptions, goals, and policies of the AQMP and, therefore, would not conflict with or obstruct implementation of the SCAQMD's AQMP. This impact would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur if the project would add a considerable cumulative contribution to federal or State non-attainment pollutants.

The Project has been evaluated to determine if it will violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it will result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin ("SCAB") is non-attainment under an applicable federal or state ambient air quality standard. The significance of these potential impacts is described below.

Standards of Significance

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table 4.1, *SCAQMD Air Quality Significance Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. It should be noted that the SCAQMD provides a threshold for emissions of lead, however for purposes of this analysis no lead emissions are calculated as there are no substantive sources of lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

Construction Emissions

Emissions are estimated using the California Emissions Estimator Model (CalEEMod) (Version 2020.4.0) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions.

Table 4.1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC[b]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants [c]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Source: SCAQMD CEQA Handbook (SCAQMD, 1993).*

[b] *The definition of volatile organic compounds (VOC) includes reactive organic gas (ROG) compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.*

[c] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.*

[d] *Ambient air quality threshold based on SCAQMD Rule 403.*

Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: June 2021.

to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[7]

[7] *South Coast Air Quality Management District, California Emissions Estimator Model, http://www.aqmd.gov/caleemod/.*

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The program uses the Emission Factor (EMFAC2017) computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2017 and Off Road (OFFROAD2011) are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of Project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in Appendix A of this Initial Study document.

Construction activities associated with the Project will result in emissions of VOCs, nitrogen oxide (NO_X), sulfur oxide (SO_X), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Demolition
- Grading
- Foundation
- Building Construction
- Architectural Coating

Construction is expected to start no sooner than April 2022 and take approximately 20-22 months. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[8] The construction activities for the Project are anticipated to include: demolition of an existing surface parking lot and existing one-story, approximately 8,473 square-foot commercial building, grading/excavation of approximately 1.04 acres, construction of approximately 65,003 square-foot creative offices, a 422 square-foot coffee shop and a 168-space subterranean parking structure, and application of architectural coatings.

Dust is typically a major concern during demolition and excavation/grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they

[8] *As shown in the California Emissions Estimator Model (CalEEMod) User’s Guide Version 2020.4.0, Section 4.3.2 “Off-Road Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.*

are called “fugitive emissions”. Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project area (approximately 1.04 acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD’s Rule 403 minimum requirements require that the application of the best available dust control measures is used for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur and is incorporated into the emissions modeling for the Project.

Construction emissions for construction worker vehicles traveling to and from the Project Site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 have been taken.

The estimated maximum daily construction emissions are summarized in Table 4.2, *Construction-Related Regional Pollutant Emissions*. Detailed construction model outputs are presented in Appendix A to this document.

As shown in Table 4.2, emissions resulting from the Project construction would not exceed regional criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source regional emissions and no mitigation measures are required.

Table 4.2
Construction-Related Regional Pollutant Emissions

Activity		Pollutant Emissions (pounds/day)					
		ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition	On-Site[a]	1.69	16.62	13.96	0.02	1.19	0.84
	Off-Site[b]	0.07	0.77	0.68	0.00	0.23	0.06
	Subtotal	1.76	17.39	14.64	0.03	1.42	0.90
Grading/Excavation	On-Site[a]	1.55	15.77	12.79	0.03	3.32	1.99
	Off-Site[b]	0.39	12.88	3.40	0.05	1.52	0.48
	Subtotal	1.94	28.65	16.19	0.08	4.84	2.47
Foundation	On-Site[a]	1.26	10.98	13.45	0.02	0.60	0.59
	Off-Site[b]	0.05	0.04	0.51	0.00	0.15	0.04
	Subtotal	1.31	11.01	13.96	0.02	0.74	0.63
Building Construction	On-Site[a]	1.65	12.50	12.73	0.02	0.59	0.57
	Off-Site[b]	0.22	1.26	2.30	0.01	0.70	0.20
	Subtotal	1.87	13.76	15.03	0.03	1.29	0.77
Architectural Coating	On-Site[a]	16.31	1.75	2.90	0.00	0.07	0.07
	Off-Site[b]	0.03	0.02	0.34	0.00	0.11	0.03
	Subtotal	16.34	1.77	3.24	0.01	0.18	0.10
Total for overlapping phases[c]		18.22	15.53	18.27	0.04	1.47	0.87
Maximum Daily Emissions		**18.22**	**28.65**	**18.27**	**0.08**	**4.84**	**2.47**
SCAQMD Thresholds		75	100	550	150	150	55
Exceeds Thresholds?		**No**	**No**	**No**	**No**	**No**	**No**

[a] *On-site emissions from equipment operated on-site that is not operated on public roads. On-site grading and site preparation PM_{10} and $PM_{2.5}$ emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.*
[b] *Off-site emissions from equipment operated on public roads.*
[c] *Construction and painting phases may overlap.*
Source: CalEEMod Version 2020.4.0.Output, available in Appendix A.
Note: Totals may not sum due to rounding.

Operational Emissions

Operational activities associated with the Project will result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. Rule 1113 (Architectural Coatings) limits paints applied to buildings to 50g/L VOC content.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Fireplaces

The Project is not proposing to install any fireplaces and therefore would not result in any emissions associated with hearths/fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. Please see Section VI Energy for additional details on energy use.

Mobile Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project.

On July 30, 2019, the City of Los Angeles updated its travel demand model, impact evaluation methodology, and transportation impact thresholds based on VMT. In accordance with the new CEQA Section 15064.3, although the City considers the Level of Service (LOS) which measures

vehicle delay during the Site Plan Review process, the Significance of Transportation Impacts for the purposes of CEQA are now determined using the VMT metric.

The Project was evaluated against the initial screening criteria to determine if a full VMT analysis was required. The Project would generate a total of 481 net daily trips (549 daily trips from the Project minus 68 daily trips from the existing use). CalEEMod uses trip generation rates to determine mobile source emissions from Project-generated vehicle trips. Therefore, the weekday VMT trip rates from the traffic analysis[9] were used to analyze the mobile source emissions from both the Project and the existing use. The CalEEMod program then applies the emission factors for each trip, which is provided by the EMFAC2017 model, to determine the vehicular traffic pollutant emissions.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts. The worst-case summer or winter criteria pollutant emissions created from the Project's long-term operations have been calculated and are shown below in Table 4.3, *Regional Operational Pollutant Emissions*.

Table 4.3
Regional Operational Pollutant Emissions

	Pollutant Emissions (pounds/day)					
Operational Activities	**VOC**	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Area Sources[a]	1.41	0.00	0.02	0.00	0.00	0.00
Energy Usage[b]	0.02	0.21	0.17	0.00	0.02	0.02
Mobile Sources[c]	1.92	2.00	18.48	0.04	4.21	1.14
Subtotal Emissions	**3.35**	**2.20**	**18.68**	**0.04**	**4.23**	**1.16**
-Existing commercial uses being removed	-0.45	-0.31	-2.53	-0.01	-0.54	-0.15
Total Emissions	**2.90**	**1.90**	**16.15**	**0.04**	**3.69**	**1.01**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

[a] *Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.*
[b] *Energy usage consists of emissions from generation of electricity and on-site natural gas usage.*
[c] *Mobile sources consist of emissions from vehicles and road dust.*
Source: CalEEMod Version 2020.4.0; the higher of either summer or winter emissions for the Project and the lower of either summer or winter emissions for the existing use, available in Appendix A.

The results from Table 4.3 show that none of the SCAQMD regional thresholds would be exceeded. Thus, a less than significant impact would occur for Project-related operational-source regional emissions and no mitigation measures are required.

[9] *Overland Traffic Consultants, Inc. Traffic Assessment for Melrose & Seward Creative Office, April 2021.*

Therefore, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, thus, would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours.

The Project Site is bounded by West Melrose Avenue to the south, by North Seward Street to the east, by the library and residential uses to the west and commercial buildings to the north.

Construction

Localized Significance – Construction

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds ("LSTs").

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM_{10}, and $PM_{2.5}$ from the Project could result in a significant impact to the local air quality. The emission thresholds

were calculated based on the Central Los Angeles source receptor area (SRA) 1 and a disturbance value of one acre per day (as the Project Site is approximately 1.03 acres).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the Project Site include: the residential uses located directly adjacent to the northern and western boundaries of the Project Site, the residential uses located approximately 96 feet (~29.3 meters) southwest of the site, on the southeastern corner of West Melrose Avenue and North June Street; and the residential uses located approximately 130 feet (~39.6 meters) southeast of the site, on the southeastern corner of West Melrose Avenue and North Seward Street. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts. Table 4.4, *Local Construction Emissions at the Nearest Receptors* shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

Table 4.4
Local Construction Emissions at the Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	16.62	13.96	1.19	0.84
Grading/Excavation	15.77	12.79	3.32	1.99
Foundation	10.98	13.45	0.60	0.59
Building Construction	12.50	12.73	0.59	0.57
Architectural Coating	1.75	2.90	0.07	0.07
SCAQMD Thresholds[a]	**74**	**680**	**5**	**3**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *The nearest sensitive receptors to the Project Site include: the residential uses located directly adjacent to the northern and western boundaries of the Project Site, the residential uses located approximately 96 feet (~29.3 meters) southwest of the site, on the southeastern corner of West Melrose Avenue and North June Street; and the residential uses located approximately 130 feet (~39.6 meters) southeast of the site, on the southeastern corner of West Melrose Avenue and North Seward Street; therefore, the 25 meter threshold was used.*

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 1 acre at a distance of 25 m in SRA 1 Central Los Angeles.

The data provided in Table 4.4, shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors.

Construction-Related Toxic Air Contaminants

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 20-22 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxic Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

Therefore, a less than significant local air quality impact would occur from construction of the Project and no mitigation measures are required.

Operation

Localized Significance – Operation

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive receptors to the Project Site include: the residential uses located directly adjacent to the northern and western boundaries of the Project Site, the residential uses located approximately 96 feet (~29.3 meters) southwest of the site, on the southeastern corner of West Melrose Avenue and North June Street; and the residential uses located approximately 130 feet (approximately39.6 meters) southeast of the site, on the southeastern corner of West Melrose Avenue and North Seward Street.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project includes 65,003 square feet of creative office space and a 422 square foot coffee shop. Due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots Analysis

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and federal CO standards which were presented above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO “hot spots” at a number of intersections in the general Project vicinity. Because of reduced speeds and

vehicle queuing, “hot spots” potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region’s unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

Per the *Transportation Assessment for Melrose & Seward Creative Office* (Transportation Assessment) in Appendix H.1 of this IS/MND, the Project would generate a total of 481 net daily trips. Table 7 in the Transportation Assessment showed that the most-impact intersection in the Project vicinity is located at Highland Avenue and Melrose Avenue. The Existing (2021) LOS during AM peak hour is LOS D. The Existing Plus Project Level of Service (LOS) would remain at LOS D at the intersection of Highland Avenue and Melrose Avenue with the addition of Project-related traffic. Therefore, as the most-impacted intersection is not at LOS E, no CO “hot spot” modeling was performed and no significant long term air quality impact is anticipated to local air quality with the ongoing use of the Project.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

According to the SCAQMD *CEQA Air Quality Handbook*, an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

> A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons 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.
>
> The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

If the proposed Project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact. Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of: office space uses; which is not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Trash receptacles for the Project would be covered, and odors from trash would be contained within the trash area. **Therefore, as the Project is required to comply with SCAQMD Rule 402, the Project would not create objectionable odors affecting a substantial number of people. Potential impacts associated with objectionable odors would be less than significant and no mitigation is required.**

Cumulative Impacts

Cumulative projects include local development as well as general growth within the Project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area.

The Project area is out of State attainment for both ozone and particulate matter (PM_{10} and $PM_{2.5}$). Because the South Coast Air Basin is currently in nonattainment for PM_{10} and $PM_{2.5}$, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or

projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As discussed above, the maximum mass daily regional construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and would not be cumulatively considerable. **The Project would not result in a significant cumulative air quality emissions impact and no mitigation measures are required.**

As with the Project, construction of the related projects is expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, similar to the Project, the related projects are also required to comply with SCAQMD Rule 402, and these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. **Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.**

IV. BIOLOGICAL RESOURCES

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

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 regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. A significant impact may occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited. The

Project Site is developed with a commercial building and two surface parking lots and is located in a developed area of the City. The Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[10] The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The Project Site is developed with a commercial building and two surface parking lots in an urbanized area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if state or federally protected wetlands are modified or removed without adequate mitigation. The Project Site is developed with a commercial building and two surface parking lots in an urbanized area of the City. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[11] Furthermore, the Project Site is fully developed and does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. **Therefore, no impacts would occur, and no mitigation measures are required.**

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[10] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, accessed January 2021.*

[11] *U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, accessed January 2021.*

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

No Impact. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. Due to the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body, and the limited vegetation on the site, the Project Site does not support any habitat for native resident or migratory species, or contain native nurseries. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

- Oak tree including Valley Oak (Quercus lobata), California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa);
- Southern California Black Walnut (Juglans californica var. californica);
- Western Sycamore (Platanus racemose); and
- California Bay (Umbellularia californica).

The Project Site also contains six non-protected trees (two street trees and four trees located on-site). The Project would require the removal of the six trees, two existing street trees: Pittosporum undulatum/Victoria Box and four courtyard trees: Cupaniopsis anacardioides/Carrotwood. Any street trees that will be removed through the development of the proposed Project would be required to comply with the City's tree removal procedures, and replacement trees would be required to be provided in conformance with the City's current guidelines and policies. There are no protected species or heritage trees. Pursuant to the LAMC, the existing trees will be replaced at a ratio of 2:1 with a minimum 24" box replacement tree (four trees). In addition, one tree per 500 square feet of planting area will be provided (8 trees per 3,797 square foot planting area). Thus a total of 12 trees will be provided as part of the Project.

The Project Site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. Additionally, there is limited vegetation landscaping on and adjacent to the Project Site. Construction of the Project would not affect any protected trees. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project is inconsistent with resource policies of any conservation plans of the types cited above. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[12] **Therefore, no impacts would occur, and no mitigation measures are required.**

[12] *California Department of Fish and Wildlife, California State Wildlife Action Plan, September 2015.*

V. CULTURAL RESOURCES

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

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if the proposed project were to adversely affect a historical resource meeting one of the above definitions.

Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology. The Project Site is currently improved with an approximately 8,473 square-foot commercial building and two surface parking lots. This building and surface parking lots would be demolished to allow construction of the Project.

The Project Site is not located in a Historic Preservation Review or Overlay Zone. Additionally, the property is not currently listed under national, state, or local landmark or historic district programs. According to the City of Los Angeles Zoning Information and Map Access System (ZIMAS) and the Los Angeles Historic Resources Inventory, neither the Project Site nor the

building on-site is identified on any historic resource lists or databases.[13] It was also not identified in any historic resource surveys of the area, including SurveyLA, the citywide historic resources survey of Los Angeles, and it is not located in a historic district or other historic overlay zone. Per the ZIMAS, the building was built in 1925.[14]

The South Central Coastal Information Center (SCCIC) is one of twelve regional Information Centers that comprise the California Historical Resources Information System (CHRIS). CHRIS works under the direction of the California Office of Historic Preservation (OHP) and the State Historic Resources Commission (SHRC). The SCCIC houses information about historical resources (e.g. location, size, age, etc.) within Ventura, Los Angeles, and Orange Counties per CHRIS standards.

A records search prepared by the SCCIC did not yield any prior evaluations of the property.[15] The SCCIC records search revealed that there are no built environmental resources within the Project Site. However, a total of 19 resources were identified within the half mile radius of the Project Site (see Appendix B). The Hollywood Community Plan area was surveyed by SurveyLA, which did not identify any potential historic resources on the Project Site. The closest Historic Preservation Overlay Zone to the Project Site is 0.0016 mile to the south across West Melrose Avenue. The closest historic structure to the Project Site is the John C. Freeman Branch Library located at 6121 West Melrose Avenue, approximately 8 feet to the west of the Site. As discussed in Section Noise XIII.b, Mitigation Measures **MM NOI-2 and MM NOI-3**, would require that heavy machinery (excavators, bulldozers, caisson drills) not be operated within 63 feet of the façade of the John C. Fremont Branch Library located west of the Project Site, and the construction contractor shall avoid using large bulldozers or caisson drills within 15 feet of the buildings directly adjacent to the Project boundaries. With the implementation of Mitigation Measures **MM NOI-2 and MM NOI-3,** the construction of the Project would not impact the adjacent Library. In addition, the property is not a historical resource subject to CEQA. **Therefore, impacts would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

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[13] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed January 2021.*

[14] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed January 2021.*

[15] *South Central Coastal Information Center, Records Search, July 12, 2021.*

The Project Site and surrounding area are not within proximity of a known archaeological site.[16] Furthermore, as discussed above, a records search prepared by the SCCIC did not reveal any prior evaluations of the property. The SCCIC records search revealed that there have been no recorded archaeological resources within half-mile radius of the of the property (including the Project Site). Nonetheless, should archaeological resources be discovered during grading or construction activities, work would cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code (PRC) Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

In addition, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of archaeological resources, and which would be imposed on the Project as part of its land use approvals. In the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified archaeologist to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. **Therefore, impacts would be less than significant, and no mitigation measures are required.**

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

Less Than Significant Impact. A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. As the Project Site has been previously developed, any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. **Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the**

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

Project's impact on human remains would be less than significant, and no mitigation measures are required.

VI. ENERGY

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

Energy data was generated for the Project to assist in the preparation of the following energy analysis and is included as Appendix C to this document.

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

Less Than Significant Impact. A significant impact may occur if a project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation.

CEQA Guidelines Appendix F recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project and provides the following factors that a lead agency may consider in the discussion of energy use:

1. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal (If appropriate, the energy intensiveness of materials may be discussed);*
2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity;*
3. *The effects of the project on peak and base period demands for electricity and other forms of energy;*
4. *The degree to which the project complies with existing energy standards;*
5. *The effects of the project on energy resources; and*
6. *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

The Project would consume energy in the form of electricity, natural gas, and petroleum-based transportation-related energy (gasoline and diesel). The Project Site receives electricity from

LADWP and natural gas from the Southern California Gas Company (SoCalGas). Transportation fuels are produced from crude oil, which can be domestic or imported from various regions around the world. The analysis of energy consumption required for construction and operation of the Project is presented below considering the six Appendix F criteria identified above. A detailed explanation of methodology and calculation sheets are provided in Appendix C of this Initial Study document.

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

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). A summary of the estimated total energy required for construction of the Project is presented in Table 4.5, *Summary of Energy Use During Project Construction*.

Electricity

As shown in Table 4.5, construction of the Project would require a total of approximately 211,777 kWh of electricity, which would be supplied by LADWP from existing electrical lines that connect to the Project Site. This electrical demand would be partially offset by the removal of existing use, which, as detailed below, is estimated to consume approximately 131,598 kWh of electricity annually. In addition, the Project's consumption of electricity during construction would represent approximately 15.5 percent of the Project's estimated net annual operational electricity demand.[17] Furthermore, the electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's net annual operational electricity. Electrical construction equipment would also comply with California Code of Regulations, Title 24 (Title 24) requirements, which are a set of

[17] *The percentage is derived by taking the total amount of electricity usage during construction (211,777 kWh) and dividing that number by the annual amount of TOTAL electricity usage during operation (1,364,833 kWh) to arrive at 15.5 percent.*

Table 4.5
Summary of Energy Use
During Project Construction[a]

Source	Quantity[b]
Electricity	
Water Consumption[c]	755 kWh
Lighting, Equipment, Other Electrical Power[d]	193,939 kWh
Construction Trailer[e]	17,083 kWh
Total Electricity	**211,777 kWh**
Gasoline[f]	
On-Road Construction Equipment[g]	10,475 gallons
Off-Road Construction Equipment[h]	0 gallons
Total Gasoline	**10,475 gallons**
Diesel[f]	
On-Road Construction Equipment[g]	42,828 gallons
Off-Road Construction Equipment[h]	16,459 gallons
Total Diesel	**59,287 gallons**

kWh = kilowatt hours

[a] *Detailed calculation sheets are provided in Appendix C of this IS/MND.*

[b] *Calculated energy consumption rounded to the nearest hundred. Totals may be off due to this rounding.*

[c] *Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using data from the CalEEMod outputs prepared for the air quality and greenhouse gas analyses.*

[d] *Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power was calculated based on CalEEMod defaults for generators (i.e. horsepower, load factors, and daily usage). As the SCAQMD recommends the use of electricity instead of diesel generators, the equivalent electricity consumption was calculated.*

[e] *Electricity used to power a standard construction trailer was calculated using the General Office default values in CalEEMod and assumed a 1,000 square-foot trailer.*

[f] *Gasoline and diesel consumption rates were based on the Project's off-road equipment list and number of on-road trips and were calculated using equipment-specific horsepower and load factors as determined by CalEEMod and county-specific miles per gallon and fleet mix as determined by EMFAC2021 for the construction start year (2022).*

[g] *On-road construction equipment encompasses construction worker trips, vendor trips, and haul trips.*

[h] *Off-road construction equipment encompasses construction equipment usage on the Project Site (e.g., excavators, cranes, forklifts, etc.).*

Source: EcoTierra Consulting, Inc., 2021.

prescriptive standards establishing mandatory maximum energy consumption levels for buildings. Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements, which includes limits on the wattage allowed per specific area, resulting in the conservation of energy.[18] In addition, construction equipment would comply with energy efficiency requirements contained in the

[18] *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[19]

Natural Gas

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

Transportation-Related Energy

As shown in Table 4.5, on- and off-road vehicles would consume an estimated 10,475 gallons of gasoline and approximately 59,287 gallons of diesel fuel throughout the Project's construction. This gasoline consumption would be partially offset while the diesel consumption would be nominally offset by the removal of the existing use, which, as detailed below, is estimated to consume approximately 5,494 gallons of gasoline and approximately 569 gallons of diesel fuel. In addition, transportation fuel usage during Project construction activities would represent approximately 0.0003 percent of the 2022 (construction year) annual on-road gasoline-related energy consumption and 0.01 percent of the 2022 annual diesel fuel-related energy consumption within Los Angeles County, respectively, as projected by CARB's EMFAC on-road vehicle emissions factor model.[20]

Furthermore, construction of the Project would comply with state and federal regulations, such as the anti-idling regulation in accordance with Section 2485 in Title 13 of the California Code of Regulations, and fuel requirements in accordance with Section 93115 in Title 17 of the California Code of Regulations, which would reduce the consumption of energy, such as petroleum-based transportation fuels, from unnecessary idling fuel combustion. While these required regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations would also result in reductions in fuel consumption. Project-related trips from on-road vehicles (i.e., haul trucks, worker vehicles) would also benefit from Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions, but would also result in fuel consumption reductions in addition to compliance with Corporate Average Fuel Economy standards.

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[19] *Energy Independence and Security Act of 2007. (Pub.L. 110-140).*

[20] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2022). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.79 billion gallons of gasoline and 516 million gallons of diesel in 2022 (the Project's construction year).*

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; water heating; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and from the Project Site by employees and visitors. A summary of the estimated annual energy required for operation of the Project is presented in Table 4.6, *Summary of Net Annual Energy Use During Project Operation*, below.

Table 4.6
Summary of Net Annual Energy Use
During Project Operation[a]

Source	Estimated Energy Demand[c]
Electricity[b]	
Structures	1,196,366 kWh
Water	168,467 kWh
Total Electricity	1,364,833 kWh
Less Existing Electricity	*131,598 kWh*
Total Net Electricity	**1,233,235 kWh**
Natural Gas[b]	
Structures	787,332 cf
Less Existing Natural Gas	*89,628 cf*
Total Net Natural Gas	**697,704 cf**
Transportation[d]	
Gasoline	40,799 gallons
Less Existing Gasoline	*5,494 gallons*
Total Net Gasoline	**35,305 gallons**
Diesel	4,484 gallons
Less Existing Diesel	*569 gallons*
Total Net Diesel	**3,915 gallons**

kWh = kilowatt hours; cf = cubic feet
[a] *Detailed calculations are provided in Appendix C of this IS/MND.*
[b] *Electricity and natural gas estimates assume compliance with applicable CALGreen and Title 24, Part 6 requirements.*
[c] *Totals may be off due to rounding.*
[d] *Gasoline and diesel consumption rates were based on the Project's annual VMT, which was calculated by CalEEMod, and were calculated using the county-specific miles per gallon and fleet mix as determined by EMFAC2021 for specific years (2022 for Existing and 2024 for Operation).*
Source: EcoTierra Consulting, Inc., 2021.

Electricity

During operation, electricity would be supplied to the Project Site by LADWP from the existing electrical system. However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system (please refer to the discussion under Section XIX, Utilities and Service Systems, below, for an analysis of potential impacts associated with installation of electrical facilities). As shown in Table 4.6, with compliance with Title 24 standards and applicable California Code of Regulations, Title 11 (CALGreen)

requirements, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,233,235 kWh (1.23 gigawatts (GWh)) per year. Based on the LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.[21] As such, the Project-related net increase in annual electricity consumption of 1,233,235 kWh per year would represent approximately 0.005 percent of LADWP's projected sales in 2024.

The Project would be required to comply with Title 24 standards and CALGreen requirements, which includes incorporation of energy efficient water features and lighting fixtures to reduce energy consumption. In addition, the Project would comply with the 2020 LAGBC. The LAGBC requires the use of numerous conservation measures, beyond those required by Title 24, and contains both mandatory and voluntary green building measures to conserve energy. Pursuant to LAGBC, the Project would incorporate ultra-low flow plumbing fixtures and all roof, balcony and plaza deck drains would feed into a 10,000-gallon rainwater harvesting cistern to be used entirely for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance and would utilize: a dedicated landscape water meter, automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules; and high efficiency irrigation emitters, including micro spray and drip irrigation (bubblers may be used for trees or shrubs where drip irrigation is not feasible). In addition, the Project's air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied.

Natural Gas

Natural gas required for Project operation would be supplied by SoCalGas from existing natural gas facilities. However, the Project would require construction of new, on-site gas distribution lines to serve the new building and connection to existing off-site natural gas facilities (please refer to the discussion under Section XIX, Utilities and Service Systems, below, for an analysis of potential impacts associated with installation of natural gas facilities). As shown in Table 4.6, with compliance with Title 24 standards and applicable CALGreen requirements, buildout of the Project would result in a projected net increase in the on-site demand for natural gas totaling approximately 697,704 cf per year. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,349 million cf per day in 2024 (the Project's buildout year) and supplies in 2024 are projected to be 3,435 million cf per day; resulting in an additional 1,086 million cf per day of available supplies.[22] As such, the Project-related net increase in annual natural gas consumption of 697,704 cf per year (or approximately 1,912 cf per day) would account for

[21] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.*

[22] *California Gas and Electric Utilities, 2020 California Gas Report, Table 33, p. 144.*

approximately 0.00008 percent of the daily 2024 forecasted consumption in SoCalGas' planning area and approximately 0.0002 percent of the additional supplies available.

The Project would be required to comply with Title 24 standards and CALGreen requirements, which includes incorporation of energy efficient mechanical equipment to reduce energy consumption. In addition, the Project would comply with the 2020 LAGBC which, as discussed above, requires the use of numerous conservation measures, beyond those required by Title 24. Pursuant to the LAGBC, the Project would include enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof, and deck insulation values. The building systems would include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls would enhance the natural ventilation whenever weather conditions permit.

Transportation-Related Energy

As summarized in Table 4.6, the Project's estimated net annual petroleum-based fuel usage would be approximately 35,305 gallons of gasoline and 3,915 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.001 percent of the 2024 annual on-road gasoline-related energy consumption and 0.0007 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County.[23]

Furthermore, some percentage of automobiles and trucks driven by Project visitors and employees would benefit from Corporate Average Fuel Economy (CAFE) standards, which would result in more efficient use of transportation fuels (lower consumption). The purpose of CAFE is to reduce energy consumption by increasing the fuel economy of cars and light trucks. Transportation fuel efficiency would improve as future Project visitors and employees replace their privately owned or leased older vehicle models with newer vehicle models that achieve greater fuel efficiency. In addition, the Project would increase density and introduce new uses on an infill Site located in an urbanized area of the City. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space. The Project would improve the streetscape and pedestrian environment, as well as promote alternative methods of transportation through the provision of both short- and long-term bicycle parking, which would serve to reduce VMT and transportation fuel consumption. In addition, the on-site drop-off area in the ground floor would encourage ridesharing and carpooling, while the on-site

[23] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.67 billion gallons of gasoline and 529 million gallons of diesel in 2024 (the Project's buildout year).*

parking would include preferential parking for electric and low-emitting vehicles, and the Project would provide over-code electric vehicle charging stations.

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

Construction

As shown in Table 4.6, construction of the Project would require a total of approximately 211,777 kWh of electricity. As discussed above, electricity would be intermittently consumed during Project construction activities for conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage over the anticipated construction period would be partially offset by the removal of existing uses and would represent approximately 15.5 percent of the Project's estimated net annual operational electricity demand, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.[24]

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

As shown in Table 4.6, on- and off-road vehicles would consume an estimated 10,475 gallons of gasoline and approximately 59,287 gallons of diesel fuel throughout the Project's construction. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site and no new facilities would be expected to be required. Construction-related gasoline consumption would be fully offset while the diesel consumption would be nominally offset by the removal of existing uses. Transportation fuel usage during Project construction activities would represent approximately 0.0003 percent of the 2022 (construction year) annual on-road gasoline-related energy consumption and 0.01 percent of the 2022 annual diesel fuel-related energy consumption within Los Angeles County, respectively, as

[24] *The percentage is derived by taking the total amount of electricity usage during construction (211,777 kWh) and dividing that number by the annual amount of TOTAL electricity usage during operation (1,364,833 kWh) to arrive at 15.5 percent.*

projected by CARB's EMFAC on-road vehicle emissions factor model.[25]

As energy consumption, including electricity and transportation-fuel during construction would not be substantial compared to existing and projected consumption, and as energy supplies of the existing purveyors are sufficient to serve the Project in addition to existing comment, construction of the Project would not materially affect the local and/or regional energy supplies and would not require additional capacity.

Operation

As shown in Table 4.6, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,233,235 kWh (1.23 GWh) per year. Based on the LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.[26] As such, the Project-related net increase in annual electricity consumption of 1,233,235 kWh per year would represent approximately 0.005 percent of LADWP's projected sales in 2024. Therefore, the Project's projected electricity demand would fall within LADWP's projected consumption and supplies for the area. Furthermore, LADWP currently has a net dependable capacity of 8,009 megawatts (MW).[27] Peak demand is expected to be 6,029 MW in 2024,[28] which would not exceed the dependable capacity of 8,009 MW. Based on these factors, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to serve the Project's electricity demand.

As shown in Table 4.6, buildout of the Project would result in a projected net increase in the on-site demand for natural gas totaling approximately 697,704 cf per year. Based on the 2020 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,349 million cf per day in 2024 (the Project's buildout year) and supplies in 2024 are projected to be 3,435 million cf per day; resulting in an additional 1,086 million cf per day of available supplies.[29] As such, the Project-related net increase in annual natural gas consumption of 697,704 cf per year (or approximately 1,912 cf per day) would account for approximately 0.00008 percent of the daily 2024 forecasted consumption in SoCalGas' planning area and approximately 0.0002 percent of the additional

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[25] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2022). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.79 billion gallons of gasoline and 516 million gallons of diesel in 2022 (the Project's construction year).*

[26] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.*

[27] *LADWP, Facts & Figures Website, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures, accessed June 16, 2021.*

[28] *LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.*

[29] *California Gas and Electric Utilities, 2020 California Gas Report, Table 33, p. 144.*

supplies available, and would therefore fall within SoCalGas' projected consumption and supplies for the area. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cubic feet/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas's estimated physical capacity of upstream pipelines. SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet, of that, 112.5 billion cubic feet is allocated to residential, small industrial, and commercial customers. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. As such, it is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand.

As summarized in Table 4.6, the Project's estimated net annual petroleum-based fuel usage would be approximately 35,305 gallons of gasoline and 3,915 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.001 percent of the 2024 annual on-road gasoline-related energy consumption and 0.0007 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County.[30] Operational transportation energy would be provided by existing retail service stations and no new retail service stations would be expected to be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[31] As such, it is expected that existing and planned transportation fuel supplies will be sufficient to serve the Project's demand.

As energy consumption, including electricity, natural gas, and transportation-fuel, during operation would be relatively negligible compared to existing and projected consumption, and as energy supplies of the existing purveyors are sufficient to serve the Project in addition to existing commitments, operation of the Project would not affect the local and/or regional energy supplies and would not require additional capacity.

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[30] *California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.67 billion gallons of gasoline and 529 million gallons of diesel in 2024 (the Project's buildout year).*

[31] *BP Global, Oil reserves, 2018.*

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of the LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all-time high peak of 6,502 MW on August 31, 2017.[32] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2024-2025 (the Project's buildout year), the base case peak demand for the power grid is expected to be 6,029 MW.[33] Under peak conditions, the Project would consume a total of 1,364,833 kWh[34] on an annual basis, which is equivalent to a daily peak load of approximately 3,739 kW (or 3.74 MW). In comparison to the LADWP power grid base peak load of 6,029 MW for 2024, the Project's estimated peak demand would represent approximately 0.06 percent of the LADWP base peak load conditions.[35] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

The degree to which the project complies with existing energy standards

Construction

Construction equipment would comply with federal, state, and regional requirements where applicable. With respect to truck fleet operators, the U.S. Environmental Protection Agency (USEPA) and National Highway Traffic Safety Administration (NHSTA) which is responsible for keeping people safe on roadways, have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.[36] USEPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.[37] The energy modeling for trucks does not account for specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on

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[32] *LADWP, Facts & Figures Website, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures, accessed June 16, 2021.*

[33] *LADWP, 2017 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1, December 2017.*

[34] *Peak demand the Project would have on the LADWP power system is calculated based on the total actual demand the Project would have on the LADWP power system, not the net demand as compared to existing conditions.*

[35] *Calculated as follows: 3.74 MW / 5,976 MW = 0.06 percent.*

[36] *California Energy Commission, Tracking Progress – Energy Efficiency Document, Last Updated: September 2018.*

[37] *BP Global, Oil Reserves, 2019, available at: https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html#oil-reserves, accessed: April 29, 2021.*

reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti- idling and emissions regulations would also result in the efficient use of construction- related energy.

Based on the information above, construction of the Project would comply with existing energy standards.

Operation

Electricity and natural gas usage during Project operations would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen requirements, and the LAGBC, in accordance with the applicable version of these standards at the time of building permit issuance. These standards include enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof, and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls would enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair would further enhance the health and wellness of the occupants. Furthermore, the Project would incorporate energy-conservation measures such as installing energy efficient appliances, and would also incorporate water conservation features, such as installing water-saving fixtures and implementing water-efficient landscaping techniques.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project's future residents, visitors, and employees would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. Transportation fuel efficiency would improve as these future Project residents, visitors, and employees replace their privately owned or leased older vehicle models with newer vehicle models that achieve greater fuel efficiency. The Project's mixed-use design and its increase in density located on an infill site in close proximity to existing transit, including rail and bus lines, its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations, and its walkable and bike-able environment support the conclusion that that the Project has been properly designed and located so that its development would achieve a reduction in VMT compared to a project with the same land uses that does not have the location-specific nor the Project design-specific benefits nor the infill nature of the Project.

Based on the information above, operation of the Project would comply with existing energy standards.

The effects of the project on energy resources

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity, and, as discussed above, LADWP's existing and planned electricity capacity and supplies would be sufficient to serve the Project's electricity demand.[38] Therefore, Project construction and operation activities would have a negligible effect on electricity supply.

Natural gas supplied to the Southern California area is mainly sourced from out-of-state with a small portion originating in California. According to the U.S. Energy Information Administration (EIA), the United States currently has about 84 years of natural gas reserves based on 2019 consumption.[39] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years.[40] Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of worldwide consumption.[41] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

One of the objectives of SB 350 was to increase the procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of its energy portfolio from renewable sources by 2030. The current sources of LADWP's renewable energy include wind, solar, and geothermal sources. These sources accounted for 34 percent of LADWP's overall energy mix in 2020, the most recent year for which data are available.[42] These represent the available off-site renewable sources of energy

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[38] *"The 2017 [Power Strategic Long-Term Resource Plan] outlines an aggressive strategy for LADWP to accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available." Source: LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2016, page ES-25.*

[39] *U.S. Energy Information Administration, Frequently Asked Questions, How much natural gas does the United States have, and how long will it last?, https://www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed June 16, 2021.*

[40] *California Energy Commission, Tracking Progress – Energy Efficiency Document, Last Updated: September 2018.*

[41] *BP Global, Oil reserves, 2018.*

[42] *Los Angeles Department of Water and Power, 2019 Power Content Labels, October 2020.*

that would meet the Project's energy demand. LADWP has committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the Renewables Portfolio Standard requirements, by increasing to 50 percent by 2025 (5 years before the 2030 requirement), 55 percent by 2030, and 65 percent by 2036. While the Project's electricity usage rate would not be directly affected by the availability of renewable energy, the Project's usage of LADWP's mix of renewable energy would indirectly avoid consumption of fossil fuels.

With regard to on-site renewable energy sources, the Project would incorporate energy-conservation measures such as installing energy efficient appliances, and would also incorporate water conservation features, such as installing water-saving fixtures and implementing water-efficient landscaping techniques. However, due to the Project Site's height and location, the solar-ready building requirements of Title 24, Section 110.10 would not be applicable to the Project,[43] and other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Therefore, the Project would support the procurement of renewable resources as feasible and would not interfere with the procurement of renewable resources.

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

The Project would include features to reduce VMT during operational activities. The Project would improve the streetscape and pedestrian environment, as well as promote alternative methods of transportation through the provision of both short- and long-term bicycle parking, which would serve to reduce VMT and transportation fuel consumption. In addition, the on-site drop-off area in the ground floor would encourage ridesharing and carpooling, while the on-site parking would include preferential parking for electric and low-emitting vehicles, and the Project would provide over-code electric vehicle charging stations. In addition, the Project Site is well served by public transit, including the Metro B Line (previously Red Line), as well as Metro local and rapid bus lines. Therefore, the Project would support the use of efficient transportation energy use and efficient transportation alternatives.

Conclusion

As detailed above, the Project's energy requirements would not substantially affect local or regional supplies or capacity. The Project's energy usage during peak and base periods would also not conflict with or exceed future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of

[43] *Title 24, Section 110.10 solar-ready building requirements for non-residential uses are limited to a height of three habitable stories or less.*

Project-related construction and operations. During construction, the Project would comply with on-road fuel economy and Title 24 energy efficiency standards where applicable, resulting in efficient use of energy. During operation, the Project would comply with energy efficiency requirements for electricity and natural gas, such as the Title 24 standards, CALGreen Code, and the LAGBC, in accordance with the applicable version of these standards at the time of building permit issuance, and consumption reduction strategies for transportation, such as supporting the use of alternative modes of transportation. In summary, the Project's energy demands would not substantially affect available energy supplies and would comply with existing energy efficiency standards. **As such, the Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation and impacts would be less than significant.**

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

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

As discussed above in response to Checklist Question VI(a), the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, CALGreen, and the LAGBC. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, the Project would comply with goals of SCAG's 2020-2045 RTP/SCS. SCAG's 2020-2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's infill siting and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. The Project's inclusion of bicycle facilities and electric vehicle charging stations would also serve to promote alternative modes of transportation to further reduce VMT. In addition, vehicle trips generated during Project operation would comply with CAFE standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, nor would it violate state or federal energy standards and impacts would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

A Geotechnical Investigation Report (Geotechnical Report)[44] was prepared for the Project to assist in the preparation of the following geology and soils analysis and is included as Appendix D.1 to this IS/MND.

a) Would the 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.

No Impact. A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

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

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.[45] According to the California Geological Society, the nearest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault Zone, an approximately 6-mile long zone running slightly northeast-southwest through Hollywood along the southern base of the Santa Monica Mountains, located approximately 1.3 miles to the north of the Project Site.[46] The Project Site is not located within a City-designated Fault Rupture Study Area.[47] Thus, the potential for fault rupture at the Project Site would be low. Furthermore, the Project would be required to comply with applicable State and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Report (see Appendix D.1) that was prepared for the Project. Final design-level soils and geological reports would be submitted to the Los Angeles Department of Building and Safety (LADBS) for review and approval as part of the standard building permit submittal package prior to Project construction.[48] Conformance with current Building Code requirements and site-specific design recommendations in the

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[44] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020.*

[45] *City of Los Angeles Department of City Planning, Zone Information & Map Access System Website, accessed: April 13, 2021.*

[46] *California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigations Interactive Map Viewer, accessed: April 2021.*

[47] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020.*

[48] *Los Angeles Municipal Code Section 91.7006.2 requires the submittal of soils and geological reports to LADBS for review and approval for all grading work in excess of 5,000 cubic yards.*

Geotechnical Report would minimize the potential for people on the Project Site to sustain loss, injury, or death as a result of fault rupture. **Accordingly, no impacts related to fault rupture would occur under the Project and no mitigation is required.**

(ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. There are several active faults in the region, including the Hollywood Fault located 1.3 miles to the north, the Newport-Inglewood Fault Zone located 3.3 miles to the southwest, the Santa Monica Fault located 3.7 miles to the west, the Raymond Fault located 6.2 miles to the northeast, and the Verdugo Fault located 7.4 miles to the northeast. The active San Andreas Fault Zone is located approximately 33 miles to the northeast of the Project Site. In addition, several buried thrust faults (those faults without a surface expression) underlie the Los Angeles and are capable of generating significant ground shaking in the Los Angeles Area, including at the Project Site.

The Geotechnical Report prepared for the Project (see Appendix D.1) provided site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site. The Project would be required through regulatory compliance, including the requirements of LAMC Section 91.7006.2, to incorporate the recommendations of the Project's geotechnical engineer and with any conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for seismic calculations from probabilistic seismic hazard modeling for the Site. In addition, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its Seismic Design Category as established in the Geotechnical Report. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code. Accordingly, the Geotechnical Report prepared for the Project concluded that development of the Project is feasible from a geotechnical engineering standpoint, provided that the advice and recommendations contained in the report are included in the Project plans and implemented during construction.[49] **Therefore, impacts related to seismic ground shaking would be less than significant and no mitigation measures would be required.**

[49] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 9.*

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

Less Than Significant Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the Project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

The Project Site is not mapped within a State-identified Liquefaction Zone.[50] Based on the historic high groundwater depth (15 feet below the ground surface), the Geotechnical Report (Appendix D.1) concluded that the liquefaction potential at the Project Site is very low.[51]

Additionally, pursuant to LAMC Section 91.7006.2, a final geotechnical report for the Project that addresses the same existing soils conditions as well as the final design of the development would be reviewed and approved by LADBS as part of the City's ministerial processes of issuing grading and building permits. The Project would be required to incorporate the recommendations of the Geotechnical Report and regulatorily required to comply with all conditions issued by LADBS per their review of the Project's Geotechnical Report, which would account for underlying soil conditions, including liquefaction potential. **Therefore, impacts related to liquefaction, would be less than significant and no mitigation measures would be required.**

(iv) Landslides?

No Impact. A significant adverse effect may occur if a project is located in a hillside area with soil conditions that would suggest high potential for sliding.

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[50] *California Department of Conservation, Geological Survey, Earthquake Zones of Required Investigations Interactive Map Viewer, accessed: April 2021.*

[51] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 7.*

The Project Site and surrounding area consist of relatively flat topography and are not located within an area identified by the State[52] or the City[53] as having a potential for landslides, or within the path of a known landslide. Furthermore, the Project does not propose substantial alterations to the existing topography that would directly or indirectly cause adverse effects related to landslides. Accordingly, the Geotechnical Report (see Appendix D.1) concluded that the Project would not be subject to hazards related to landslides and that development of the Project would be feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the report are included in the Project plans and are implemented during construction.[54] **Therefore, no impacts related to landslides would occur, and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

During construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion is unlikely to occur. All grading activities require permits from the LADBS, which reviews compliance with requirements and standards designed to limit potential impacts, including from erosion, to acceptable levels. In addition, all on-site grading and Project Site preparation is required to comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan for the Project would conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

During construction, the Project would be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 would be provided to the satisfaction of the Los Angeles Department of Building and Safety. During operation, the Project Site would be entirely covered with the structure and minor amounts of landscaping and there would be no exposed soil that would be susceptible to erosion. Accordingly, the Project would not have the potential to result in substantial soil erosion or the loss of topsoil. **Impacts would be less than significant, and no mitigation measures would be required.**

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[52] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 7.*

[53] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas.*

[54] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 9.*

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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above.

Consolidation/collapse tests conducted on the subsurface soils at the Project Site as part of the Geotechnical Report indicate that artificial fills were encountered at a depth of 2.5 feet below the ground surface The artificial fill generally consists of dark brown clay with varying amounts of gravel and is characterized as slightly moist and firm. The fill is likely the result of past grading or construction activities at the site. Deeper fill may exist between excavations and in other portions of the site that were not directly explored. The Project Site is underlain by Pleistocene age alluvial sediments that are considered stiff to hard or medium dense to dense and are not prone to liquefaction. Based on these considerations the potential for liquefaction and associated ground deformations beneath the Project Site is very low.

The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general site vicinity. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site.

The topography at the Project Site is relatively level and the topography in the immediate site vicinity slopes gently to the south-southwest. The Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[55] Also, the Project Site is not located within an area identified as having a potential for seismic slope instability. There are no known landslides near the Project Site, nor is the site in the path of any known or potential landslides. Therefore, the potential for slope stability hazards to adversely affect the proposed development is considered low.

In addition, safe construction practices would be exercised through required compliance with the City Building Code, the Geotechnical Report's recommendations, and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to site conditions and soil conditions, including soil stability. The Geotechnical Report prepared for the Project (see Appendix D.1) concluded that the Project would not be subject to hazards related to instability, such as settlement, slippage, or landslide provided that the recommendations contained in the Geotechnical Report are followed and implemented during design and

[55] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 7.*

construction.[56] **Therefore, impacts related to instability would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

The subterranean parking levels will extend approximately 35 feet below the existing ground surface including foundations depths and dewater systems. Subsurface exploration conduction as part of the Geotechnical Report (see Appendix D.1) determined that the soils beneath the Project Site are artificial fills that were encountered at a depth of 2.5 feet below the ground surface The artificial fill generally consists of dark brown clay with varying amounts of gravel and is characterized as slightly moist and firm. The fill is likely the result of past grading or construction activities at the site. Deeper fill may exist between excavations and in other portions of the site that were not directly explored. The fill soils are underlain by Pleistocene age old alluvial fan deposits consisting of brown to dark brown, reddish brown, yellowish-brown or olive brown interbedded silty sand, clayey sand, sandy silt, sandy clay, and clay. The alluvium is characterized as primarily fine to medium-grained, slightly moist to moist, and medium dense to dense or stiff to hard.[57]

Based on depth of the proposed subterranean levels, the proposed structure would not be prone to the effects of expansive soils.[58] Furthermore, the Project would be required to comply with the City of Los Angeles Uniform Building Code, the Los Angeles Municipal Code, and other applicable building codes which include building foundation requirements appropriate to Site-specific conditions, such as expansion potential, established in the Geotechnical Report, and any conditions or recommendations established for the Project by the LADBS during their review of Project plans and the Geotechnical Report as part of the building and grading permit approval process (pursuant to LAMC Section 91.7006.2). The Project's Geotechnical Report concluded that neither soil nor geologic conditions (including the expansion potential) were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and

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[56] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 7.*

[57] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 2.*

[58] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 12.*

implemented during design and construction.[59] **Therefore, impacts from expansive soil would be less than significant and no mitigation measures would be required.**

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

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Therefore, no septic tanks or alternative disposal systems would be necessary, nor are they proposed. **Accordingly, no impacts related to inadequate septic tank support would occur and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature.

The Project Site is located in a developed, urban area that has been previously subject to disturbance, including grading and development. Per the General Plan Framework EIR, there are no known paleontological resources within the Project Site.[60] Additionally, a Vertebrate Paleontology Records Check was conducted by the Los Angeles County Natural History Museum for paleontological resources on the Project Site and vicinity. The research did not find any recorded paleontological resources within the Project Site boundaries (see Appendix D.2). The research did find that there are localities of resources nearby from the same sedimentary deposits occurring at depth in the Project Area.[61] Therefore, as the Project would require excavation for subterranean parking, utility and foundation work, and grading and there would be a potential to encounter buried paleontological resources.

The Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources that may be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during Project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources."[62] The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

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[59] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, page 9.*

[60] *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles.*

[61] *Correspondence from Samuel A. McLeod, Ph.D., Vertebrate Paleontology, Natural History Museum of Los Angeles County, May 11, 2021.*

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

Therefore, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Accordingly, impacts would be less than significant and no mitigation measures would be required.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Air quality data was generated for the Project to assist in the preparation of the following greenhouse gas emissions analysis and is included as Appendix A to this document.

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

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds.

Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. The City has adopted the LA Green Plan to provide a citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of GHG emissions. In order to implement the goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LAGBC (Ordinance No. 181,480). The LAGBC requires projects to achieve a 20 percent reduction in potable water use and wastewater generation. Through required implementation of the LAGBC, the proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs.

CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with regulatory programs to reduce GHG emissions. Because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. The Climate Change Scoping Plan approved by the California Air Resources Board; the City's LA Green Plan; and Sustainable City pLAn all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill (AB) 32) and the Global warming

Solutions Act (also known as Senate Bill (SB) 32). Thus, the Lead Agency has determined that the Project would not have a significant effect on the environment if the Project is found to be consistent with AB 32/SB 32 and SB 375 (through demonstration of conformance with the 2020–2045 RTP/SCS) and the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 Climate Change Scoping Plan, and the Sustainable City pLAn/L.A.'s Green New Deal. The Project's consistency with these applicable regulatory plans and policies is discussed in threshold (b) below.

However, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy State CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water/wastewater, and construction equipment. The following provides the methodology used to calculate the Project-related GHG emissions and the Project impacts.

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. CalEEMod Version 2020.4.0 was used to calculate the GHG emissions from the Project. The CalEEMod Annual Outputs for year 2021 for the existing commercial land use (to be removed) and for year 2023, for the Project, are available in Appendix A, of this document. As shown in Table 4.7, *Project-Related GHG Emissions*, the GHG emissions from the existing commercial use (being removed) were subtracted from the Project total. Each source of GHG emissions is described in greater detail below.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. The Project will comply with SCAQMD Rule 1113. SCAQMD Rule 1113 states that paints applied to building envelope are limited to 50g/L VOC content. No changes were made to the default area source emissions.

Table 4.7
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	0.01
Energy Usage (Electricity & Natural Gas)	417.80
Mobile Sources (Motor Vehicles)	392.12
Solid Waste Generation	32.83
Water/Wastewater	88.57
Construction Emissions	24.03
Project Subtotal	**955.35**
-Existing Commercial Use Being Removed	-106.17
Project total	**849.18**

Calculation sheets are provided in Appendix A of this document.
Source: CalEEMod Version 2020.4.0 for Opening Year 2023 for the Project and Year 2021 for Existing Uses.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.[63]

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the Project. The vehicle trips associated with the Project have been analyzed based on the Project trip generation rates as detailed in Section III above. As discussed in Section XVII of this document, the Project would generate a total of 481 net daily trips (549 daily trips from the Project minus 68 daily trips from the existing use). Based on the data in the Transportation Assessment, the Project would not result in any significant VMT transportation impacts.

Emissions of GHGs associated with mobile sources from operation of the Project are based on the average daily trip rate, trip distance, the GHG emission factors for the mobile sources, and the Global Warming Potential (GWP) values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the South Coast Air Basin as provided in EMFAC2017 and CalEEMod. Annual mobile source GHG emissions in units of MTCO2e are generally calculated as follows:

Annual Emissions [MTCO2e] = (Σi (Units × ADT × DTRIP × Days × EF × GWP)i) ÷ 2204.6

[63] *No changes were made to the CalEEMod default energy use settings. The baseline for the current CalEEMod energy use defaults is 2019 Title 24 Standards.*

Where:

Units = Number of vehicles (same vehicle model year and class)

ADT = Average daily trip rate [trips/day]

DTRIP = Trip distance [miles/trip]

Days = Number of days per year [days/year]

EF = GHG emission factor [pounds per mile]

GWP = Global warming potential [CO2 = 1, CH4 = 25, N2O = 298]

2204.6 = Conversion factor [pounds/MT]

i = Summation index

Waste

Waste includes the GHG emissions generated from the processing of waste from the Project as well as the GHG emissions from the waste once it is interred into a landfill. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[64] AB 341 requires that 75 percent of waste be diverted from landfills by 2020. It is anticipated that the Project would recycle at least 50 percent of its solid waste (see Appendix A mitigated values in the Annual CalEEMod output for details on reduction emissions). No other changes were made to the default waste parameters.

Water/Wastewater

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. Reductions for Project design features (low-flow appliances and water-efficient landscape irrigation) are shown in the mitigated CalEEMod output values. No other changes were made to the default water usage parameters.

Construction

The construction-related GHG emissions were also included in the analysis and were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The construction-related GHG emissions were calculated by CalEEMod.

The GHG emissions have been calculated based on the parameters as described in Section III above. A summary of the results is shown below in Table 4.7, *Project-Related GHG Emissions* and the CalEEMod Model runs for the both the existing use (to be removed) and the Project are

[64] *City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.*

provided in Appendix A of this document. Table 4.7 shows that the subtotal for the Project's emissions would be 955.35 MTCO2e per year. With the removal of the existing uses, the emissions are reduced to 849.18 MTCO2e per year.

As stated above, because there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

As set forth above, the Project would generate incrementally increased GHG emissions over existing conditions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. As discussed under threshold b) below, the Project would be consistent with the 2020–2045 RTP/SCS, the Climate Change Scoping Plan, and the *Sustainable City pLAn/L.A.'s Green New Deal*. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of project design features discussed in other sections of this IS/MND, would minimize the Project's GHG emissions. **Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts with respect to GHGs would be less than significant. No mitigation measures would be required.**

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the AB32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

Applicable plans adopted for the purpose of reducing GHG emissions include the CARB Scoping Plan (2008 and 2017 Scoping Plans), the City of Los Angeles Sustainable City pLAn, and the 2016/2020 RTP/SCS discussed below.

Consistency with CARB Scoping Plan

CARB's Scoping Plan identifies strategies to reduce California's GHG emissions in support of Assembly Bill ("AB") 32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation.

Reduction measures are grouped into 18 action categories, as follows:

1. **California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap–and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.

2. **California Light-Duty Vehicle Greenhouse Gas Standards.** Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.

3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).

4. **Renewables Portfolio Standards.** Achieve 33 percent renewable energy mix statewide.

5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.

6. **Regional Transportation-Related GHG Targets.** Develop regional GHG emissions reduction targets for passenger vehicles.

7. **Vehicle Efficiency Measures.** Implement light-duty vehicle efficiency measures.

8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.

9. **Million Solar Roofs Program.** Install 3,000 megawatts of solar-electric capacity under California's existing solar programs.

10. **Medium- and Heavy-Duty Vehicles.** Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010.5 Future, yet to be determined improvements, includes hybridization of MD and HD trucks.

11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.

12. **High Speed Rail.** Support implementation of a high-speed rail system.

13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.

14. **High Global Warming Potential Gases.** Adopt measures to reduce high warming global potential gases.

15. **Recycling and Waste.** Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.

16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million MTCO2e/yr.

17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.

18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table 4.8, *Scoping Plan Consistency Summary*, summarizes the Project's consistency with the State Scoping Plan. As summarized, the Project will not conflict with any of the provisions of the

Table 4.8
Scoping Plan Consistency Summary

Action	Supporting Measures	Consistency
Cap-and-Trade Program	--	**Not Applicable**. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect commercial/residential projects.
Light-Duty Vehicle Standards	T-1	**Not Applicable**. This is a statewide measure establishing vehicle emissions standards.
Energy Efficiency	E-1 E-2 CR-1 CR-2	**No Conflict**. The Project will include a variety of building, water, and solid waste efficiencies consistent with 2019 CALGREEN requirements.
Renewables Portfolio Standard	E-3	**Not Applicable**. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	**Not Applicable**. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related Greenhouse Gas Targets	T-3	**Not Applicable.** This is a statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	**Not Applicable**. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5 T-6	**Not Applicable**. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While these measures are

Table 4.8
Scoping Plan Consistency Summary

Action	Supporting Measures	Consistency
		yet to be implemented and will be voluntary, the proposed Project would not interfere with their implementation.
Million Solar Roofs (MSR) Program	E-4	**Not Applicable**. The MSR program sets a goal for use of solar systems throughout the state as a whole. The project currently does not include solar energy generation, and it is unknown if the building roof structure will be designed to support solar panels in the future.
Medium- & Heavy-Duty Vehicles	T-7 T-8	**Not Applicable**. MD and HD trucks and trailers accessing the Project will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the Project would interfere with implementation of these requirements and programs.
Industrial Emissions	I-1 I-2 I-3 I-4 I-5	**Not Applicable**. These measures are applicable to large industrial facilities (> 500,000 $MTCO_2e$/yr) and other intensive uses such as refineries.
High Speed Rail	T-9	**Not Applicable**. Supports increased mobility choice.
Green Building Strategy	GB-1	**No Conflict**. The Project will include a variety of building, water, and solid waste efficiencies consistent with CALGREEN requirements.
High Global Warming Potential Gases	H-1 H-2 H-3 H-4 H-5 H-6 H-7	**Not Applicable**. The proposed Project is not a substantial source of high GWP emissions and will comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
Recycling and Waste	RW-1 RW-2 RW-3	**No Conflict**. The Project will recycle a minimum of 50 percent diversion to recycling from construction activities and operations pursuant to AB 939, AB 341 and AB 75 requirements.
Sustainable Forests	F-1	**No Conflict**. The Project will increase carbon sequestration by increasing on-site trees per the Project landscaping plan.
Water	W-1 W-2 W-3 W-4 W-5 W-6	**No Conflict**. The Project will include use of low-flow fixtures and water-efficient landscaping pursuant to CalGreen requirements.
Agriculture	A-1	**Not Applicable**. The Project is not an agricultural use.

Note: Supporting measures can be found at the following link: https://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf
Table Source: EcoTierra Consulting, 2021.

Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping. As shown above, the Project would be consistent with the applicable measures established in the Scoping Plan.

Consistency with SB 32

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05, to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed above, is consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 target are too far in the future to define in detail." In the First Scoping Plan Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; largescale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."

Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively, the 2050 target of Executive Order S-3-05 has not been codified, so the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in Cleveland National Forest Foundation v. San Diego Association of Governments (2017) 3 Cal.5th 497 (Cleveland National). The case arose from San Diego Association of Governments (SANDAG's) adoption of its 2050 Regional Transportation Plan, which included its Sustainable Communities Strategy, as required by SB 375. On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, since the Project is much smaller in size and scope in comparison to the Regional Transportation Plan examined in Cleveland National, assessing the Project's consistency with regard to the 2050 target of Executive Order S-3-05 is not necessary for determining compliance with CEQA.

The 2017 Scoping Plan builds on the 2008 Scoping Plan in order to achieve the 40 percent reduction from 1990 levels by 2030. Major elements of the 2017 Scoping Plan framework that will achieve the GHG reductions include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing Zero Emission Vehicle (ZEV) buses and trucks. When adopted, this measure would apply to all trucks accessing the Project site; this may include existing trucks or new trucks purchased by the project proponent, which could be eligible for incentives that expedite the Project's implementation of ZEVs.

- Low Carbon Fuel Standard (LCFS), with an increased stringency (20 percent by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
- Implementing SB 350, which expands Renewables Portfolio Standard (RPS) to 50 percent and doubles energy efficiency savings by 2030. When adopted, this measure would apply when electricity is provided to the Project by a utility company.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. When adopted, this measure would apply to all trucks accessing the Project Site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
- Post-2020 Cap-and-Trade Program that includes declining caps. When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
- 20 percent reduction in GHG emissions from refineries by 2030. When adopted, the Project would be required to comply with this measure if it were to utilize any fuel from refineries.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink. This is a statewide measure that would not apply to the Project.

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.[65]

LA Sustainable City pLAn

While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

[65] *California Legislative Information, Senate Bill No. 32, [Online] September 8, 2016. https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.*

The 2019 L.A. New Green Deal is the first four-year update to the Sustainable City pLAn. It augments, expands, and elaborates in more detail the City's vision for a sustainable future and it addresses the climate emergency with accelerated targets and new aggressive goals. The Project will contribute towards the attainment of the aspirations and goals previously identified in the Regulatory Framework discussion above by:

- Obtaining power from a utility provider that supplies 55% renewable energy by 2025.
- Including components that will reduce building energy use per square foot 22% by 2025.
- Reducing Vehicle Miles Traveled per capita by at least 13% by 2025.
- Ensuring 57% of new housing units are built within 1,500 feet of transit.

The proposed Project would use energy from the Los Angeles Department of Water and Power (LADWP), which currently provides 34 percent of electricity via renewable sources but has committed to providing an increasing percentage from renewable sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The proposed Project would be designed and constructed to meet LA Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The proposed Project would include Energy Star® appliances where applicable and would be a modern development with energy efficient heaters and air conditioning systems. As such, the proposed Project would be consistent with the goals and initiatives in the L.A. Green New Deal.

A discussion of the Project's consistency with the Sustainable City pLAn targets is provided below in Table 4.9, *Project Consistency with the LA Sustainable City pLAn*.

Table 4.9
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Local Water. 20% reduction in water use per capita by 2017; 22.5% by 2025; and 25% by 2035.	**No conflict**. The Project would be consistent with the LAMC to reduce water consumption by 20 percent. The Project is required to follow CalGreen Standards which mandates a 20 percent reduction in indoor water use.
Solar Power. Increase cumulative total megawatts of local solar photovoltaic power to between 900-1,500 megawatts by 2025 and 1,500 to 1,800 megawatts by 2035 as well as increasing the cumulative total megawatts of energy storage capacity to at least 1,654 to 1,750 megawatts by 2025.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, Energy Star appliances, and LED lighting.
Energy Efficient Buildings. Reduce energy use per square foot below 2013 baseline levels for all building types by at least 14% by 2025 and 30% by 2035 and use energy efficiency to deliver 15% of all of the City's projected electricity needs by 2020.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. Project would include, but not be limited to: The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, Energy Star appliances, and LED lighting.
Carbon and Climate Leadership. Reduce GHG emissions below 1990 baseline by at least	**No conflict.** The Project would be designed to incorporate energy and water efficient design that meet

Table 4.9
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. Improve GHG efficiency of the City from 2009 levels by 55 percent by 2025 and 75 percent by 2035.	or exceed the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code standards and incorporate energy and water efficiency measures. The Project includes design features and compliance with Code measures that will assist in the reduction of Project-related GHG emissions. Some of these design features include: The Project would include, but not be limited to: enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system will be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems will include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls will enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair will further enhance the health and wellness of the occupants. Water usage will be minimized via the use of ultra-low flow plumbing fixtures throughout the project. All roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern, approximately 10,000-gallon capacity, to be used entirely for irrigation of the on-site landscaping. The irrigation system shall be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system should utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas will include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. The on-site drop-off area in the ground floor will encourage ridesharing and carpooling, while the on-site parking will include preferential parking for electric and low-emitting vehicles, and the project will provide over-code electric vehicle charging stations.
Waste and Landfills. Increase land fill diversion rates to at least 90 percent by 2025 and 95 percent by 2035, as well as increasing proportion of waste products and recyclable commodities productively reused and repurposed within the County of Los Angeles to at least 25 percent by 2025 and 50 percent by 2035.	**No conflict**. the Project would be required to implement recycling programs that reduce waste to landfills by a minimum of 75 percent (per AB 341). The Project would be served by a solid waste collection and recycling service that may include mixed-waste processing, and that yields waste diversion results comparable to source separation and consistent with citywide recycling targets. The Project would also comply with the City of Los Angeles Space Allocation Ordinance (171,687) which requires that developments include a recycling area or a room of a specified size on the Project Site.

Table 4.9
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Housing and Development. Increase cumulative new housing unit construction to 100k by 2021, 150k by 2025, and 275k by 2035. Ensure proportion of new housing units built within 1,500 feet of transit is at least 57 percent by 2025 and 65 percent by 2035.	**Not applicable.** The Project includes construction of a new, 67,889 square foot, creative office building. The proposed Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space.
Mobility and Transit. Reduce daily VMT per capita by at least 5 percent by 2025 and 10 percent by 2035. Increase the percentage of all trips made by walking, biking, or transit to at least 35 percent by 2025 and 50 percent by 2035.	**No conflict.** The Project is an urban center/infill development located in close proximity to transit. Additionally, the Project is a 67,889 square foot, creative office building. As part of the 168 parking spaces, a total of 16 spaces would be designated for clean air vehicles, and 10 spaces would be designated for EV charging stations. The Project provides 9 short term bicycle parking spaces and 17 long-term bicycle parking spaces, located and configured in compliance with applicable requirements of the LAMC. One shower for each gender, and a total of 26 lockers, will be provided in the first level of the parking facility.
Air Quality. Increase the percentage of electric and zero emissions vehicles in the city to 10 percent by 2025 and 25 percent by 2035 as well as increasing the percentage of port-related goods movement trips that use zero-emissions technology to at least 15 percent in 2025 and 25 percent in 2035.	**No conflict**. The Project will comply with applicable City of Los Angeles Building Codes pertaining to building code requirements for charging station prewiring and installation of charging stations at workplaces.
Note: This analysis focuses on the Sustainable City pLAn targets most applicable to the Project. *Source: City of Los Angles Sustainable City pLAn, April 2015 and L.A.'s Green New Deal Sustainable City pLAn 2019.*	

The analysis above describes the consistency of the Project with the City's *Sustainable City pLAn*. As discussed in Tables 4.8 and 4.9, generally the Project's consistency with the plans and policies should be demonstrated by a combination of regulatory compliance (green building code etc.) as well as Project-specific characteristics (water conservation, energy conservation, and other features consistent with these plans). Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for the reduction of GHG emissions.

As discussed above, the Project would comply with the LA Green Building Code and CALGreen Code which would ensure energy efficiency and installation of water conserving fixtures. Moreover, the Project Site would utilize energy from LADWP, which is actively increasing its use of renewable sources. The Project would locate creative office space and a commercial/retail land use close to transit opportunities. The Project Site is served by several bus lines on West Melrose Avenue and North June Street. The proximity of the Project Site to these transit stops would provide employees easy access to the new development on the Project Site. In addition, the Project would provide 26 bicycle parking spaces. Therefore, the Project would be consistent with the goals of the LA Green Plan.

City of Los Angeles Sustainable City pLAn

The Sustainable City pLAn, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control. It also provides specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking, or transit by at least 35 percent by 2025. The Sustainable City pLAn was updated in April 2019 and renamed as L.A.'s Green New Deal. This latest document establishes targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. Although the Sustainable city pLAn/Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally comply with these aspirations as the Project is an infill development that would densify an existing land use within a HQTA.

Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensures that the City stays within its carbon budget between 2020 and 2050.The Project would generally comply with these aspirations as the Project is an infill development, which is located near regional and local transit services. The Project would be well-served by transit and would generally further goals to reduce GHG emissions by promoting infill development, density, more efficient transportation, etc. Furthermore, the Project would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project employees and guests. Therefore, the Project would be consistent with the Sustainable City pLAn and the Green New Deal.

LA Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2020 comply with the current Los Angeles Green Building Code as amended to comply with the 2019 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include: ten percent of the required and proposed parking spaces will have chargers for electric vehicles and 30 percent of the required and provided parking spaces will be pre-plumbed for future electric vehicle charging; enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values; low-water use plumbing fixtures/appliances, rainwater harvesting cistern, water-efficient landscaping and drip irrigation. The Project will comply with the City of Los Angeles' Green Building Ordinance standards and reduce emissions beyond a "Business-as-Usual" scenario.

2020-2045 RTP/SCS

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[66,67]

On September 1, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020– 2045 RTP/SCS or Connect SoCal. As with the 2016–2020 RTP/SCS, the purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[68] Applicable Goals and Guiding Principles of the 2020-2045 RTP/STS include:

- Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Enhance the preservation, security, and resilience of the regional transportation system.
- Increase person and goods movement and travel choices within the transportation system.
- Reduce greenhouse gas emissions and improve air quality
- Support health and equitable communities.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS. Hence, because the proposed Project would be consistent with the 2016–2040 RTP/SCS as discussed below, the proposed Project would also be consistent with the 2020–2045 RTP/SCS.[69]

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[66] *Southern California Association of Governments, Final 2016-2040 RTP/SCS.*

[67] *Southern California Association of Governments, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance off GHG Quantification Determination, June 2016.*

[68] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

[69] *For example, the proposed Project would be consistent with both the 2016–2040 RTP/SCS and the2020–2045 RTP/SCS because it would increase urban density within a HighQuality Transit Area (HQTA) located less than 0.5 miles from a planned Metro Purple light rail station and in close proximity*

Consistent with SCAG's 2016 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand. The Project Site is located within an HQTA as designated by the 2016 RTP/SCS.[70,71] As discussed previously, the Project Site is an urban center location close to jobs, off-site housing, shopping and entertainment uses and in close proximity to public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The 2016 RTP/SCS projects that these urban center/infill areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- New approximately 67,889 square foot, creative office building with coffee shop;
- Jobs closer to transit;
- New job growth focused in HQTAs (defined by the 2016 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours); and
- Biking and walking infrastructure to improve active transportation options and transit access.

Further, the vertical integration of land uses on the Project Site will produce substantial reductions in auto mode share to and from the Project Site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Additionally, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Project would be located in an area well-served by public transit. Specifically, Metro operates bus routes in close proximity to the site, along West Melrose Avenue and North June Street. The Project would include bicycle facilities and create a pedestrian-friendly environment by providing landscaped walkways. The Project Site is located adjacent to a mature network of streets that

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to more than a dozen bus routes, would include transit-oriented development, and would implement TDM, all of which would reduce the City's per capita VMT and associated air emissions. Another example is that because the proposed Project would be consistent with the City's existing General Plan land use designation and zoning of the Project Site, it has been accounted for in the regional growth projections in both the 2016–2040 RTP/SCS and 2020–2045 RTP/SCS.

[70] *SCAG, 2016 RTP/SCS April 2016, Exhibit 5:1 High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[71] *Metro, High Quality Transit Areas-Southwest Quadrant Map.*

include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the area. The Project would not conflict with RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

As demonstrated above, the Project would be consistent with the applicable goals, including those pertaining to reductions in GHG emissions, in the 2016 RTP/SCS.

The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Project-specific impacts with respect to GHG emissions would be less than significant, and no mitigation is required.

Cumulative Impacts

A cumulatively considerable impact would occur where the impact of the Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to California Air Pollution Control Officers Association (CAPCOA), "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. **Given that the analysis above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would also be considered less than significant.**

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

A Phase I Environmental Site Assessment (ESA)[72] was conducted for the Project to assist in the preparation of the following hazards and hazardous materials analysis and is included as Appendix E to this document.

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

Less Than Significant Impact. A significant impact may occur if a project involves use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban development project. All of these materials would be used temporarily during construction. Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Construction activities would be contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Operation of the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a 67,889 square foot, creative office building, and parking associated with this use. These typical urban uses do not involve the routine use of hazardous materials**.** Instead, the operation of the Project has limited hazardous materials to those similar to any other commercial urban development such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. As a result, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Therefore, operation of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. The Project would be required to comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the

[72] *L. Joseph Associates, LLC. Phase I Environmental Site Assessment, 6101-6111 Melrose Avenue Los Angeles, California 90038, October 8, 2019.*

Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing.

Therefore, impacts related to the transport, use, and disposal of hazardous materials would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

As stated above, an ESA was conducted for the Project Site in October 2019 (see Appendix E). The purpose of the ESA was to identify existing or potential recognized environmental conditions (RECs) affecting the Project Site that could indicate the potential for release of hazardous material into the environment. A REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The ESA also categorizes RECs as controlled RECs and/or historical RECs. A controlled REC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

No RECs, historical RECs, or controlled RECs were identified for the Project Site.[73] The nearest hazardous release site to the Project Site is listed at Veiling Plating, 755 Seward Street, Los Angeles, California. This site is located approximately 400 feet north of the Project Site. Historical metal plating operations at this site impacted the subsurface soil and, to a lesser degree, groundwater beneath this site with metals and volatile organic compounds (VOCs). Mitigation operations consisted of soil excavation and off-site disposal, and a Land Use Covenant has been recorded which limits future land use types at this site. The Department of Toxic Substances Control (DTSC) is not requiring any further environmental assessment or mitigation operations at this time, and it is unlikely that the subsurface soil, groundwater, or soil vapor beneath the Project

[73] *L. Joseph Associates, LLC. Phase I Environmental Site Assessment, 6101-6111 Melrose Avenue Los Angeles, California 90038, October 8, 2019, p. 2.*

Site has been significantly impacted in association with this release. Furthermore, the ESA concluded that further assessment of RECs associated with the Project Site would not be required.[74]

Based on the built date of the existing structure on the Project Site (1929[75]), asbestos-containing materials and lead-based paint may be present. However, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6(c), Code of Federal Regulations, Title 29, Section 1926.1101(b), Code of Federal Regulations, Title 40, Part 61, Subpart M, and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected lead-based paint would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1. Adherence to the regulations and procedures would ensure that all materials containing asbestos and lead-based paint would be remediated and disposed of in accordance with federal, state, and local regulations. **Accordingly, impacts related to the release of hazardous materials into the environment would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant adverse effect may occur if a project site is located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

The closest school to the Project site is Wagon Wheel School (653 North Cahuenga Boulevard) located 0.3 miles to the east of the Project Site. However, as detailed above in response to Question IX(a) and Question IX(b), impacts related to hazardous materials during construction and operation of the Project would be less than significant. The Project would be required to comply with manufacturer recommendations and all federal, state, and local regulations for the storage, use, transport, and disposal of hazardous materials. Furthermore, the school would be generally shielded from the Project Site by its distance from the Project Site, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site. **As such, impacts related to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school would be less than significant and no mitigation measures would be required.**

[74] *L. Joseph Associates, LLC. Phase I Environmental Site Assessment, 6101-6111 Melrose Avenue Los Angeles, California 90038, October 8, 2019, p. 19.*

[75] *L. Joseph Associates, LLC. Phase I Environmental Site Assessment, 6101-6111 Melrose Avenue Los Angeles, California 90038, October 8, 2019, p. 1.*

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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The ESA prepared for the Project (see Appendix E), included a search of environmental records published by local, state, tribal, and federal agencies pursuant to Government Code Section 65962.5. The Project Site was listed in the EDR Historical Cleaners database. This listing is related to "Bardwil Said clo clnr" being listed at 6103 Melrose Avenue in a 1933 city directory.

As noted in the ESA, it is unlikely that this listing is related to commercial dry cleaning companies at the subject property, based on the years in which these occupants were listed, the short period of operation, and the building configuration. Additionally, it was common for city directories to identify the occupation of residential tenants in directories produced in the 1940s and earlier. According to the ESA these "clothes cleaners" listings do not represent an REC that warrants further investigation, and It is unlikely that the subsurface soil, groundwater, or soil vapor beneath the subject property was adversely impacted in association with this listing.[76] **Accordingly, impacts associated with the Site's inclusion on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project is located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The Project Site is located approximately 11.1 miles south of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible

[76] *L. Joseph Associates, LLC. Phase I Environmental Site Assessment, 6101-6111 Melrose Avenue Los Angeles, California 90038, October 8, 2019, p. 16.*

to noise levels that would exceed the annoyance threshold for noise (defined as >65 Community Noise Equivalent Level (CNEL) for commercial airports such as the Hollywood-Burbank Airport).[77] **Accordingly, impacts associated with safety hazards or excessive noise from proximate airports would be less than significant and no mitigation measure would be required.**

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

Less than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

La Brea Avenue is identified as a selected disaster route by the City[78] and as a secondary disaster route by Los Angeles County.[79] Construction of the Project would not require road closures and emergency access to the Project Site would be maintained in accordance with the LAMC and the Los Angeles Fire Department (LAFD) requirements. In addition, construction of the Project would not substantially impede public access or travel on public rights- of-way such as La Brea Avenue or Melrose Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

Additionally, operation of the Project would not permanently alter vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. Furthermore, as discussed below under Section XVII, Transportation, the Project would not result in any significant traffic impacts. The Project Site is not located within a Hillside Area[80] and the Project would comply with evacuation requirements according to the LAMC and the LAFD. An emergency response plan would be submitted to the LAFD during review of plans as part of the City's standard building permit process. **Therefore, impacts to emergency response and evacuation plans would be less than significant and no mitigation measures would be required.**

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and poses a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire.

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[77] *Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.*

[78] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

[79] *Los Angeles County Department of Public Works, Disaster Routes with Roads Districts Map, North Los Angeles County, September 24, 2012.*

[80] *City of Los Angeles Department of City Planning, Zone Information & Map Access System Website, accessed: February 2020.*

The Project Site is not located in a Very High Fire Hazard Severity Zone;[81] nor is the Project Site within a wildland fire hazard area.[82] In addition, the Project Site is located in a highly urbanized area of the City, and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. **Accordingly, no impacts related to the exposure of people or structures to loss, injury, or death involving wildland fires would occur and no mitigation measures would be required.**

[81] *City of Los Angeles Department of City Planning, Zone Information & Map Access System Website, accessed: January 2021.*

[82] *City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

X. HYDROLOGY AND WATER QUALITY

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

A Hydrological Evaluation[83] was conducted for the Project to assist in the preparation of the following hydrological and water quality analysis and is included as Appendix F to this document.

[83] *Geocon Consultants ,Inc., Hydrological Evaluation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, February 7, 2022.*

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Groundwater was encountered during subsurface exploration conducted as part of the Geotechnical Report to the maximum depth explored (32 feet below the ground surface)[84] and historically high groundwater depth in the vicinity is approximately 15 feet below the ground surface.[85] Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 35 feet below ground surface, including foundation excavations and dewatering systems. Based on these considerations, groundwater may be encountered near the excavation bottom. Due to the depth of the proposed excavation and the potential for seasonal fluctuation in the groundwater level, temporary dewatering measures would be required to reduce groundwater during excavation and construction.

Construction activities associated with the Project have the potential to increase stormwater runoff and degrade surface water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, during demolition, excavation, as well as from runoff from construction and construction equipment. The total disturbance area during construction would be less than one acre. Thus, construction stormwater regulations and the need for a stormwater pollution prevention plan (SWPPP) would not directly apply to the Project. However, construction activities would be subject to the requirements of the Los Angeles Regional Water Quality Control Board Order No. R4-2012-0175, National Pollutant Discharge Elimination System (NPDES) No. CAS00400, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the County. Section VI.D.8, of this Permit, Development Construction Program, requires Permittees (which include the City of Los Angeles) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed federal, state, and local mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without

[84] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 3.*

[85] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 3.*

limitation, containing storm water within the construction area during subsurface excavation, installing sediment filters around the construction area and on drop inlets, use of truck tire cleaning grids, covering trucks before soil is hauled offsite, sweeping the streets around the Project Site, disposing of waste in accordance with applicable laws and regulations, promptly cleaning up leaks and spills, and maintaining all equipment in good working order.

Specific BMPs for the Project would include:

- Dust control measures to reduce offsite deposition of fine sediment;
- Installation of sediment filters on drop inlets near the site on West Melrose Avenue and North Seward Street;
- Use of truck tire cleaning grids to reduce track out;
- Tarping trucks that are transporting excavated soil offsite;
- Regular street sweeping around the site, if track out or dust accumulation occurs;
- Proper vehicle and equipment maintenance to reduce leaks and spills; and
- Compliance with proper procedures for use and disposal of hazardous substances.

During the period when excavation is occurring at the Project Site, runoff could also be reduced substantially by retaining storm water within the disturbance area.

Dewatering would be required to reach the full excavation depth and allow construction of the subterranean parking garage. The dewatering would produce groundwater that would need to be discharged to a nearby storm sewer or sanitary sewer inlet in accordance with the proper permits from the Regional Water Quality Control Board and the City and/or County of Los Angeles. A dewatering analysis is provided in Appendix F. The dewatering analysis identifies the quantity of water that might be produced, the magnitude and extent of the temporary drawdown of the groundwater surface around the Project Site, and the potential for the dewatering to produce contamination from nearby sites.

The dewatering analysis in Appendix F presumes that dewatering for the Project would occur within fine-grained soils using trenches within the shored excavation. In addition, the analysis is based on the reported historic high groundwater level of 15 ft bgs.

The stabilized dewatering rates after one year of dewatering are estimated to range from 0.5 gallons per minute (gpm) for the low transmissivity case, to 2 gpm for the middle transmissivity case, to 12 gpm for the high transmissivity case. These low pumping rates are due to the fine-grained nature of the soils beneath the Project Site.

The effective drawdown is estimated to range from 2.9 to 8.1 feet at the edge of the excavation, depending on the actual soil properties beneath the Project Site. At the center line of North Seward Avenue, the drawdown after one year of dewatering is estimated to potentially range from 2.0 feet to 7.5 feet. At the east side of North Seward Street and at the center line of West Melrose

Avenue, the drawdown after one year of dewatering is estimated to range from 1.3 feet to 7.0 feet. If the dewatering duration is shorter or longer than one year, the drawdowns would be proportionally smaller or larger, respectively, than those described for one year of dewatering. Additional details and discussion are presented in Appendix F.

Based on the parameters identified in the dewatering simulations, the capture zone during dewatering could range from 43 feet to 212 feet from the edge of the excavation after one year of dewatering to as much as 53 feet to 260 feet from the edge of the excavation if dewatering occurs for 18 months, depending on the actual hydraulic conductivity of the fine-grained saturated soils beneath the Project Site.

The California State Water Resources Control Board maintains the Geotracker website, which identifies active and closed contamination sites throughout California. Our review of Geotracker indicates that there are no currently active groundwater contamination sites within 1,500 feet of the Project Site. Residual contamination may be present at two closed sites located approximately 1,000 feet north of the Project Site and six closed sites located 1,500 feet to the east and to the west of the Project Site. The concentration levels of any residual contamination at these closed sites are not indicative of the presence of persistent contaminant plumes.

While there are no identified contaminant plumes within at least 1,500 feet of the Project Site, there is the potential that groundwater beneath the Project Site may contain low levels of residual fuel hydrocarbons and/or dry cleaning-related chemicals. If such chemicals are present in the water pumped from the excavation during dewatering, then contaminant treatment would be required to meet the discharge requirements of permits from the Regional Water Quality Control Board and City or County of Los Angeles.

Operation

The roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern with a capacity of approximately 10,000 gallons. The harvested rainwater would be used exclusively for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas will include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible.

The LACDPW Hydrology Manual (2006) requires projects to have drainage facilities that meet the Urban Flood level of protection. The Urban Flood is runoff from a 25-year frequency design storm falling on a saturated watershed. The City also considers the 50-year frequency design storm event to analyze potential impacts on surface water hydrology as a result of development. Thus, to provide a more conservative analysis, this Hydrological Evaluation uses the larger storm event (the 50-year, 24-hour storm) as the design storm event for evaluation of potential impacts. According to the Los Angeles County hydrology map, the 50-year, 24-hour storm event has a magnitude of 5.81 inches and will be used as the design storm event for evaluation of potential impacts.

With respect to runoff water quality during operation of the Project, Los Angeles County and all cities within LA County (except for the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of this Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, and would thus apply to the Project which is a "Designated Project" under the Los Angeles County Department of Public Works (LACDPW) Low Impact Development (LID) standards. This Program requires, among other things, that projects retain on site the runoff volume from: (a) the .75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The 85th percentile, 24-hour rain event for the Site is 1.01 inches. The runoff from this storm event is referred to as the stormwater quality design volume (SWQDv). The City and County LID standards provide stormwater management requirements for “Designated Projects” and include items such as management of the SWQDv on-site using infiltration, evapotranspiration, stormwater runoff harvesting and re-use, or a combination of these methods.

The Project would also be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by the Regional Water Quality Control Board for the Los Angeles Region. As a permittee, the City of Los Angeles is responsible for implementing the requirements of the County-wide SUSMP within the City. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drainage system. The system incorporated into the Project must follow specific design requirements set forth in the MS4 permit and must be approved by the City as part of the standard building permit process.

In addition, the Project would be subject to the provisions of the City’s Low Impact Development (LID) Ordinance effective May 12, 2012, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the site. The SUSMP consists of structural BMPs built into the design of a project for ongoing water quality purposes over the life of a project.

As discuss in the Hydrological Evaluation (Appendix F) and shown in Table 4.10, *Hydrological Parameter and HydroCalc Results*, for the 50-year, 24-hour design storm event, the time of concentration and the peak flow rate are the same due to the very small Project area. However, the peak runoff decreases by more than 10 percent, from 88,144 gallons to 79,049 gallons, due to the decrease from 95 percent to 76 percent of the area that would be impervious as a result of

Table 4.10
Hydrological Parameters and HydroCalc Results

Site Parameters				50-yr 24-hr rain event (LA CEQA Threshold)					
Scenario	Area (acres)	Slope	Percent Impervious	Rainfall Depth (in)	Peak Intensity (in/hr)	Time of Conc. (cd, minutes)	Peak flow rate (cubic feet per second)	Peak Runoff (cubic feet)	Peak Runoff (gallons)
Existing Condition	0.643	0.006	95	5.81	3.47	5	2.01	11,784	88,144
Proposed Condition	0.643	0.006	76	5.81	3.47	5	2.01	10,568	79,049
Site Parameters				**85th Percentile 24-hr event (LID Manual)**					
Scenario	Area (acres)	Slope	Percent Impervious	Rainfall Depth (in)	Peak Intensity (in/hr)	Time of Conc. (cd, minutes)	Peak flow rate (cubic feet per second)	SWQDv (cubic feet)	SWQDv (gallons)
Existing Condition	0.643	0.006	95	1.01	0.37	14	0.21	2,016	15,080
Proposed Condition	0.643	0.006	76	1.01	0.37	14	0.20	1,681	12,574

Source: Geocon Consultants, Inc. Hydrological Evaluation (Appendix F), February 2022.

the Project. As discussed in Appendix F, the 50-year, 24-hour event is used to determine the size of the drainage facilities to meet the Urban Flood level of protection and to evaluate potential impacts. Since the Project design incorporates a system to harvest up to 10,000 gallons of rainwater, the stormwater drainage system for the Project would need to be designed to convey approximately 69,049 gallons over a 24-hour period, at a peak rate of 2.01 cubic feet per second. Since the runoff from the Project would be less than that from existing, or baseline, conditions, there would be a less than significant impact related to drainage and stormwater runoff per the applicable CEQA threshold.

For the 85th percentile, 24-hour design storm event, the time of concentration and the peak flow rate are effectively the same due to the very small Project area. However, the SWQDv decreases by over 25 percent, from 15,080 gallons to 12,574 gallons, due to the decrease from 95 percent to 76 percent of the area that would be impervious as a result of the Project. As discussed above, the Project must manage the SWQDv using infiltration, evapotranspiration, stormwater runoff harvesting and re-use, or a combination of these methods. The Project design already includes a runoff harvesting and re-use system which would address up to 10,000 gallons. Thus, the Project would need to develop additional LID management methods to address the additional 2,574 gallons of the SWQDv not addressed by the harvesting and re-use system. LACDPW LID Standards Manual describe a range of BMPs and source control measures that could be used to filter the stormwater runoff before discharge offsite. These methods include additional rainwater harvesting, flow-through planters, tree-well filters, and use of permeable pavement at ground level to promote percolation to the subsurface, among others.

Furthermore, operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground storage tanks are currently operated at the Project Site nor would any be operated by the Project. While the development of new building facilities would slightly increase the use of on-site hazardous materials, such as cleaning, maintenance, and landscaping supplies, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

With compliance with regulatory requirements, a project-specific SUSMP, and BMPs, construction and operation-related water quality impacts would be reduced to a level of less than significant and no mitigation measures would be 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?

No Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

As discussed above, groundwater was encountered during subsurface exploration conducted as part of the Geotechnical Report to the maximum depth explored (32 feet below the ground surface)[86] and historically high groundwater depth in the vicinity is approximately 15 feet below the ground surface.[87] Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of 35 feet below ground surface, including foundation excavations and dewatering systems. Based on these considerations, groundwater may be encountered near the excavation bottom. As stated above in Section X(a), due to the depth of the proposed excavation and the potential for seasonal fluctuation in the groundwater level, temporary dewatering measures would be required to reduce groundwater during excavation and construction.

As stated above, dewatering would be required to reach the full excavation depth and allow construction of the subterranean parking garage. The dewatering would produce groundwater that would need to be discharged to a nearby storm sewer or sanitary sewer inlet in accordance with the proper permits from the Regional Water Quality Control Board and the City and/or County of Los Angeles. A dewatering analysis is provided in Appendix F. The dewatering analysis identifies the quantity of water that might be produced, the magnitude and extent of the temporary

[86] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 3.*

[87] *Geocon West ,Inc., Geotechnical Investigation, Proposed Commercial Development 6103 West Melrose Avenue, Los Angeles, California, April 28, 2020, p. 3.*

drawdown of the groundwater surface around the Project Site, and the potential for the dewatering to produce contamination from nearby sites.

The dewatering analysis in Appendix F presumes that dewatering for the Project would occur within fine-grained soils using trenches within the shored excavation. In addition, the analysis is based on the reported historic high groundwater level of 15 ft bgs.

The stabilized dewatering rates after one year of dewatering are estimated to range from 0.5 gallons per minute (gpm) for the low transmissivity case, to 2 gpm for the middle transmissivity case, to 12 gpm for the high transmissivity case. These low pumping rates are due to the fine-grained nature of the soils beneath the Project Site.

The effective drawdown is estimated to range from 2.9 to 8.1 feet at the edge of the excavation, depending on the actual soil properties beneath the Project Site. At the center line of North Seward Avenue, the drawdown after one year of dewatering is estimated to potentially range from 2.0 feet to 7.5 feet. At the east side of North Seward Street and at the center line of West Melrose Avenue, the drawdown after one year of dewatering is estimated to range from 1.3 feet to 7.0 feet. If the dewatering duration is shorter or longer than one year, the drawdowns would be proportionally smaller or larger, respectively, than those described for one year of dewatering. Additional details and discussion are presented in Appendix F.

Based on the parameters identified in the dewatering simulations, the capture zone during dewatering could range from 43 feet to 212 feet from the edge of the excavation after one year of dewatering to as much as 53 feet to 260 feet from the edge of the excavation if dewatering occurs for 18 months, depending on the actual hydraulic conductivity of the fine-grained saturated soils beneath the Project Site.

In addition, the Project would receive water from the Los Angeles Department of Water and Power (LADWP) and would not include supply wells or other direct methods of groundwater withdraw.

Regarding groundwater recharge, the Project Site is currently entirely impervious with no groundwater recharge potential. The Project would develop hardscape and structures that cover the entire Project Site with impervious surfaces. The roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern with a capacity of approximately 10,000 gallons. The harvested rainwater would be used exclusively for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas will include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Therefore, the groundwater recharge potential would remain minimal. The stormwater that bypasses the proposed BMP systems would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow.

Therefore, the Project would not substantially decrease groundwater supplies in a manner that would impede sustainable groundwater management of the basin. **No impacts to groundwater supplies and recharge would occur and no mitigation measures would be required.**

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

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

Less than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

Construction activities for the Project would include demolition of the existing structure, grading, building the proposed structure, and constructing hardscape and landscape around the building. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. However, as previously discussed, the Project would implement an ESCP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. The ESCP measures are designed to contain stormwater or construction watering on the Project Site so runoff does not impact offsite drainage facilities or receiving waters. Construction activities are temporary and flow directions and runoff volumes during construction would be controlled. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion during construction.

In its present condition, the Project Site is nearly 100 percent impervious, and stormwater discharges directly to West Melrose Avenue and North Seward Street. The Project would develop a building and paved areas that cover virtually the entire surface area of the Project Site; as a result, post-development, the Project Site would remain nearly 100 percent impervious. The roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern with a capacity of approximately 10,000 gallons. The harvested rainwater would be used exclusively for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas will include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Therefore, the Project would not significantly alter the drainage pattern of the Project Site. Furthermore, no exposed soil would exist at the Project Site during operation. Accordingly, the potential for erosion of soils at the Project Site would be low. The surrounding streets and adjacent properties are also developed with hardscape and do not contain exposed soil that would be susceptible to erosion.

Therefore, based on the above, through compliance with all MS4 requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or offsite during construction or operation. **Impacts related to erosion or siltation would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties.

As discussed under Question X(ci), during construction of the Project, a temporary alteration of the existing on-site drainage pattern may occur from the demolition of existing structures and land cover, and site preparation and grading for construction. However, these changes would not result in a substantial increase in the rate or amount of surface runoff that could result in flooding due to stringent controls imposed under the NPDES MS4 Permit, including preparation of an ESCP and BMPs for the control of runoff.

Additionally, as also discussed under Question X(ci), the Project would not significantly alter the drainage pattern of the Site. Furthermore, the Project is unlikely to alter the drainage pattern in a manner that would result in substantial flooding during operation because the Project would be required to comply with the requirements of the SUSMP, MS4 permit, and LID Ordinance, which result in and require a reduction of the volume of runoff from the Project Site after the Project is constructed. Additionally, because adherence to these regulations and permits would prevent an increase in stormwater flows, and because the Project would not alter offsite water conveyance facilities, no offsite flooding would occur.

Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in flooding on- or offsite. **Impacts related to flooding would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site. A project-related significant adverse effect may also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

As previously discussed, the Project would not increase the amount of surface runoff from the Project Site during construction. The Project would prepare an ESCP and include BMPs for the

control of runoff and water quality impacts during construction in accordance with the MS4 Permit. Therefore, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems during construction. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration, and would not result in any significant environmental impacts given the disturbed nature of the right-of-way. Furthermore, as the Project would manage, capture, and treat runoff during construction, as required by regulatory compliance, implementation of the Project would represent an improvement in water quality as compared to the existing condition where runoff sheet flows untreated to the drainage system.

Operation-Related Project Impacts

As previously discussed, the Project would not significantly increase the amount of impervious surface at the Project Site; therefore, it is unlikely that the amount of runoff from the Project Site would significantly increase. Moreover, the Project would be required to comply with the LID Ordinance, which, as noted above, would limit or reduce flows to the City storm drain system during operation. The Project BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site. Furthermore, with regard to polluted runoff, the LID requirements for the Project Site would outline the stormwater treatment post-construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program.

Conclusion

Therefore, based on the above, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff during construction or operation. **Impacts would be less than significant and no mitigation measures would be required.**

(iv) Impede or redirect flood flows?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of flood flows.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal

flood hazard.[88] No streams or rivers that may overflow or breech a levee are located on or near the Project Site and the Project Site is not located within any high-risk coastal areas.

The City of Los Angeles Safety Element indicates that the Project Site is located within the inundation area boundaries of the Hollywood Reservoir and Mulholland Dam.[89] However, the Project does not propose any structures which would impede floodwater such as a dam or berm, and, as detailed above, no substantial alterations to the existing drainage pattern of the Project Site or area would occur during construction or operation. Accordingly, the Project would not be expected to impede or redirect flood flows from the Hollywood Reservoir or the Mulholland Dam. Additionally, this reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. 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 considered earthquake for the site as well as other conditions that could undermine the integrity of the dam. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. **Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

As discussed in Question X(civ), the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[90]. Additionally, the Project Site is over 11 miles from the Pacific Ocean and not within an area potentially impacted by a tsunami.[91] There are also no

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[88] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1340F, effective October 2020.*

[89] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, August 8,1996.*

[90] *Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1340F, effective October 2020.*

[91] *California Department of Conservation, Los Angeles County Tsunami Inundation Maps, accessed April 16, 2021.*

major water bodies in the vicinity of the Project Site that would put the Project Site at risk of inundation by seiche.

As previously discussed, the Los Angeles County General Plan Safety Element indicates that the Project Site is located within the inundation area boundaries of the Mulholland Dam.[92] Inundation of the Project Site resulting from dam failure could release pollutants into surface water should flood waters encounter contaminants at the Project Site. However, the Project proposes commercial uses, which do not represent the type of use that would otherwise degrade water quality (e.g., an industrial land use that could adversely affect water quality). Anticipated and potential pollutants generated by the Project would be limited to those typical of the proposed land uses and include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. These materials would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. **Therefore, the Project would not risk release of pollutants due to inundation. Impacts would be less than significant, and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans.

Water quality control plans applicable to the Project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL).[93]

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[92] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, August 8,1996.*

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

Implementation Plans and Watershed Management Plans

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, construction of the Project is not expected to encounter groundwater and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the MS4 Permit, including implementation of an ESCP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the proposed commercial and artist land uses do not represent the type of use that would have the ability to adversely affect water quality. Anticipated and potential pollutants generated by operation of the Project would be addressed through the implementation of approved LID BMPs. While the development of new building facilities would slightly increase the use of on-site hazardous materials (i.e., those typically used on commercially zoned properties such as cleaning, maintenance, and landscaping supplies), compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local, and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically over drafted basins until 2020) to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically over drafted basins) to achieve groundwater sustainability.

The Project Site overlies the Coastal Plain of Los Angeles-Hollywood Groundwater Basin.[94] The Project would receive its water from the LADWP. Both the LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater

[94] *California Natural Resources Agency, Groundwater Basin Boundary Assessment Tool, Interactive Map Website, accessed February 2020.*

basin through native and imported groundwater recharge. Further, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando Basin. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years.

As described in detail in Question XIX(b), the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code**.** Furthermore, as previously discussed, neither construction nor operation of the Project is anticipated to encounter groundwater, therefore, the extraction of groundwater would not be required. Additionally, the Project would not have the potential to impact the amount of groundwater recharge as the Project Site is entirely impervious and does not currently provide recharge for the groundwater basin.

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

XI. LAND USE AND PLANNING

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

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is located at 6101-6117 West Melrose Avenue and 713-735 North Seward Street, and is bounded by West Melrose Avenue to the south, by North Seward Street to the east, by North June Street to the west and West Waring Avenue to the north.

The 45,136 square-foot Project Site is currently developed with a 8,473 square-foot commercial building and two surface parking lots. The Project Site does not include any roadways or access to other streets or properties. The Project Site is surrounded by other development and there are no existing residences on the site, or a residential use that would be physically separated or otherwise disrupted by the Project. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. **Therefore, no impact would occur, and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project Site is currently zoned C4-1XL, and CM-1VL and has a General Plan land use designation of Commercial Manufacturing in the Hollywood Community Plan. The Project Site is

located in Height District No. 1VL that restricts the height to 45 feet, three stories, and the portion of the Project Site that is located in Height District No. 1 XL, restricts the height development to 30 feet, two stories. Additionally, the Project Site is designated a Los Angeles State Enterprise Zone, a Revised Hollywood Injunction, and Transit Priority Area in the City of Los Angeles.

The Applicant has requested a Zone and Height District Change from C4-1XL and CM-1VL to CM-2 which would allow the Project to be developed with a FAR of 1.88:1 and to a maximum height of 77 feet 9 inches (73 feet 6 inches to the top of the parapet), five stories.

The Project includes the demolition of the existing one-story, approximately 8,473 square-foot commercial building, and the construction of a new, 67,889 square-foot office building The proposed building would be developed with a maximum height of 77'-9"/ five-stories. Two buildings with a total of 17,134 square feet of existing creative office would remain on the northern portion of the Project Site.

The Project is composed of a five-story creative office building built above a subterranean garage. The building massing is comprised of two volumes atop a podium and stitched together with several planted decks and an east exterior exiting stairway. The west elevation terraces down to reduce the buildings massing along the neighboring residential lots.

The building design includes use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements these include painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall.

Project Site Improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of West Melrose Avenue. New street trees shall be provided in accordance with City recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division.

At its maximum height, the proposed building would be taller than the other building heights in the vicinity, however, the proposed design is compatible with the design elements of surrounding buildings, especially those with similar use. As stated above, the west elevation terraces down to reduce the buildings massing along the neighboring residential lots as shown in the Figures 3.11 through 3.14.

The following is a list of applicable land use plans, policies, and regulations:

- SCAG Regional Transportation Plan (RTP)
- City of Los Angeles General Plan
- Mobility Element 2035

- Citywide Design Guidelines
- Hollywood Community Plan
- Hollywood Redevelopment Plan

Consistency with Regional Plans

Southern California Association of Governments (SCAG)/Regional Transportation Plan (RTP)

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2019-2040 RTP/SCS, increase the share of new regional household growth occurring in HQTA's by six percent and the share of new job growth in HQTAs by 15 percent.

The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTA and TPA, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient

access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with the applicable objectives of the 2019-2040 RTP/SCS.

Consistency with Local Plans

City of Los Angeles General Plan

The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Single-Family Residential, Multifamily Residential, Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, General Commercial Areas, Mixed-Use Boulevards, Industrial Districts, Transit Stations, Pedestrian-Oriented Districts, and Historic Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City. The Project Site is identified as being located within a Commercial Manufacturing Area.

Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City for existing and future residents. This chapter defines "urban form" as the City's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods

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

Open Space and Conservation Chapter

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

Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies include retaining commercial uses, particularly within walking distance of residential areas, promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods, and retaining industrial land uses on appropriate sites.

Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. The City Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016. Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035.

Infrastructure and Public Services Chapter

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

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 4.11, *Applicable Objectives and Policies of the General Plan Framework Element* along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed below for informational purposes. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

Table 4.11, lists the goals, objectives, and policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable policies.

Table 4.11
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No conflict.** The Project would construct a five-story, 67,889 square-foot office building, thereby contributing to the diversity of businesses in the area. The Project would be located adjacent to commercial and transit uses and would support those uses by locating potential employees and transit users in an area served by transit and commercial options.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**No conflict.** As shown in Figure 2-1 of the Community Plan, the Project Site is located in a Transit-Oriented District. The Project would develop office uses in this area and expand employment opportunities. Development of office uses would serve the needs of existing and future residents in the area by increasing employment in the area. The concentration of development would support the Project area's existing range of services and activities and would be consistent with the Community Plan land use designation.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	**No conflict.** As discussed in the Initial Study of this Draft EIR, the agencies that provide public infrastructure, services, and utilities to the Project Site would have capacity to serve the Project.
Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks and urban open spaces.	**No conflict.** While the Project does not provide any dedicated public parkland, the Project would provide a minimum of 11,325 square feet of open space for employees. The Project would include pocket courtyard, pocket patio, and the decks.
Objective 3.2: To provide for the spatial distribution of development that promotes an	**No conflict.** The Project would promote an improved quality of life by constructing infill development near

Table 4.11
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	several public transit option, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project encourages active transportation by including 26 bicycle parking stalls and bike amenities, such as one shower for each gender, and a total of 26 lockers, will be provided in the first level of the parking facility.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No conflict.** The Project location in an area well-served by transit and office uses would encourage bicycle access to these uses. The Project would provide secure bicycle parking to promote cycling.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No conflict.** The Project would provide new creative office in an urbanized area well-served by transit, and within walking distance of commercial uses. The creative office use would support the Project area's existing range of services and activities and would be consistent with the Community Plan land use designation.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	**No conflict.** The Project would include replacing any sidewalks and the installation of new curb, gutter, trees, and streetlights, as needed, to accommodate the Project.
Urban Form and Neighborhood Design Chapter	
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No conflict.** The Project would incorporate security features into the Project design to enhance safety. These features include controlled access to residential areas via gated pedestrian entries, the utilization of security staff at the two primary entrances, and the use of cameras for video surveillance around the Project perimeter.
Open Space and Conservation Chapter	
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve	**No conflict.** The Project would provide a minimum of 11,325 square feet of open space for employees. The Project would include pocket courtyard, pocket patio, and the decks.

Table 4.11
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
as neighborhood landscape and recreation amenities.	
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No conflict.** The Project would be required to obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit and would implement a Stormwater Pollution Prevention Plan that specifies Best Management Practices and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would implement Low Impact Development requirements throughout the operational life of the Project. Consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No conflict.** The Project would implement Low Impact Development requirements throughout the operational life of the Project.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No conflict.** The Project would be within the Los Angeles Department of Water and Power's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not require or result in the construction of new water facilities or expansion of existing facilities.

Source: City of Los Angeles, The Citywide General Plan Framework Element, adopted December 11, 1996 and August 8, 2001; EcoTierra Consulting, 2021.

Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Mobility Plan 2035 includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of these goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is included in Table 4.12, *Applicable Policies of the Mobility Plan 2035* along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy.

Table 4.12
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
Chapter 1: Safety First	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	**No conflict.** The Project would prepare and implement a Construction Management Plan that would reduce construction-related impacts on the surrounding community, and would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce the use of residential streets and congestion to pubic streets and highways.
Chapter 2: World Class Infrastructure	
Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	**No conflict.** The Project would not modify existing bicycle facilities. The Project would enhance bicycle facilities on-site by providing short-term and long-term bicycle spaces in conformance with the City's Bicycle Ordinance.
Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.	**No conflict.** Vehicular access to the Project Site would be provided via a two-way entry/ exit driveway on North Seward Street. The Project will also include an at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations. The existing four-foot easement on the west side of the Project Site will be expanded to provide a five-foot setback that will provide one of the project's required exits to West Melrose Avenue. Therefore, all loading would occur off-street and internally to the Project Site.
Chapter 3: Access for All Angelenos	
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral of the City's transportation system.	**No conflict.** Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility. The Project

Table 4.12
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
	would promote the use of bicycles by providing access to short-term and long-term bicycle parking spaces on Site.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No conflict.** The Project would provide a creative office use in an urbanized area well-served by transit, and within walking distance of commercial uses. The office use would support the Project area's existing range of services and activities and would be consistent with the Community Plan land use designation.
Policy 3.4: Provide all residents, workers, visitors with affordable, efficient, convenient, and attractive transit services.	**No conflict.** The Project Site is located in an area well-served by public transit.
Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No conflict.** The Project would provide bicycle parking spaces on-site in accordance with LAMC requirements. The Project would provide 9 long-term bicycle parking spaces and 17 short-term spaces, for a total of 26 bike parking spaces. The bicycle parking spaces would be located in the subterranean parking structure.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	**No conflict.** The Project supports reductions in VMT by providing an office use within walking distance of a well-developed transit system, as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for employees to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists.
Source: City of Los Angeles, Mobility Plan 2035, September 7, 2017; EcoTierra Consulting, 2021.	

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines are intended to "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized around Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Project conforms to the Citywide Design Guidelines (adopted by City Planning Commission October 24, 2019), as shown in Table 4.13.

Table 4.13
Citywide Design Guidelines

Guideline	Would the Project Conflict?
Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.	**No conflict.** The Project proposes a welcoming pedestrian entrance on North Steward Street. The entrance will include signage and covered entryway so that pedestrians can safely and comfortably enter and exit. Glass facades and ample landscaping will further create a transparent and welcoming environment for pedestrians as they either enter or walk around the Project Site. A diverse range of plants and trees will surround the Project Site to further create a naturally welcoming environment for pedestrians and visitors. Ample lighting along North Seward Street and West Melrose Avenue are proposed to further maintain a comfortable and accessible pedestrian experience.
Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.	**No conflict.** An at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations has specifically been proposed to ensure safe loading/unloading for employees and visitors. Vehicular access to the Project Site will be via a two-way entry/ exit driveway on North Seward Street. The Project will provide 168 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. The Project will provide approximately 16 spaces at in the at-grade level, with the balance of the parking being located in two below-grade levels accessed by internal vehicle ramps. As part of the 168 parking spaces, a total of 16 spaces would be designated for clean air vehicles, and 10 spaces would be designated for EV charging stations. Mechanical parking stackers will be provided on the second subterranean parking level. The Project parking is designed for managed parking at all levels (surface to the second underground level). The Project would be consistent with applicable parking requirements of the LAMC. This further ensures any vehicles that may otherwise be searching for street parking and disrupt the pedestrian experience are easily accommodated on-site. Landscaping around the entire perimeter of the Project Site buffers the appearance of the office from the street view to provide a visually appealing pedestrian experience.
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	**No conflict.** The Project proposes to include 26 bicycle parking spaces located in the parking structure. The screening provided by landscaping and the underground parking will reduce any car vehicle headlight visibility from the public right-of-way and from pedestrian view.
Guideline 4: Organize and shape projects to recognize and respect surrounding context. .	**No conflict.** The Project will include design elements that reinforce orientation to the street, including a glass facade and a clearly identifiable pedestrian entrance along North Seward Street. The building design includes use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel

Table 4.13
Citywide Design Guidelines

Guideline	Would the Project Conflict?
	system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements these include painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall. Project Site Improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of West Melrose Avenue. New street trees shall be provided in accordance with City recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division and will allow for a pleasant sidewalk view and experience.
Guideline 5: Express a clear and coherent architectural idea.	The Project incorporates the use of modern materials. The Project's facade is comprised of three systems: a vertical metal panel system, a stucco system, and Simulated Wood Cladding System with punched windows and window walls throughout. The Project's façade incorporates a variety of materials to break a solid wall to provide interest with vertical elements these include painted stucco, wood frames, wood paneling, wood soffit, white metal panels, aluminum window frames, Perforate Metal hand rails, high performance glazing, and an art wall. At its maximum height, the proposed building would be taller than the other building heights in the vicinity, however, the proposed design is compatible with the design elements of surrounding buildings, especially those with similar use. As stated above, the west elevation terraces down to reduce the buildings massing along the neighboring residential lots as shown in the Figures 3.11 through 3.14. The incorporation of ample landscaping around the perimeter complements the architectural style of the building and maintains a buffer as needed from unappealing views for pedestrians and adjacent properties.
Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.	**No conflict.** Project Site improvements include planting at grade along the facades on West Melrose Avenue and North Seward Street as well as on the upper level terraces, and planting on the north side of the building in and near the shared plaza. This shared plaza between the Project and the existing creative office space to the north will be delineated from the

Table 4.13
Citywide Design Guidelines

Guideline	Would the Project Conflict?
	surface parking and valet through plantings as well as ground pavers. Planting along North Seward Street and West Melrose Avenue will connect the future tenant interior and exterior space. A total of 12 trees will be provided as part of the Project. The Project will also provide 2,870 square feet of landscaping. Landscaping would be added to the pocket courtyard, pocket patio, decks, and on West Melrose Avenue and at the North Seward Street entrance. The Project will not be open to the public, thus no LAMC code required open space, recreational space is required. The Project will provide 11,325 square feet of non-required open space for the proposed tenants. This open space includes the pocket courtyard, pocket patio, and the decks. The Project proposes to include ample landscaping along the perimeter of the Project to provide pedestrians and visitors with a visually appealing and pleasing view.
Guideline 7: Carefully arrange design elements and uses to protect site users.	**No conflict.** Project proposes to include a clearly delineated and safely accessible entrance along North Seward Street for pedestrians. An at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations has specifically been proposed to ensure safe loading/unloading for employees and visitors. Vehicular access to the Project Site will be via a two-way entry/ exit driveway on North Seward Street.
Guideline 8: Protect the site's unique natural resources and features.	**No conflict.** The Project includes ample landscaping with a variety of trees and shrubs that promote growth of natural resources throughout the perimeter of Project Site. The Project preserves the natural topography of the Project Site by creating subterranean parking for the creative office.
Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.	**No conflict.** Parking spaces will in a subterranean garage to prevent any excessive headlight impact or glare from headlights of vehicles.
Guideline10: Enhance green features to increase opportunities to capture stormwater and promote habitat.	**No conflict.** The Project proposes to include ample landscaping with a variety of trees and shrubs that enhance the green features and promote opportunities for stormwater capture. These selected plants are proposed to be native and drought-tolerant as feasible and available.
Source: City of Los Angeles, Citywide Design Guidelines, October 24, 2019. EcoTierra Consulting, 2021.	

Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan (Community Plan), which was adopted in December 1988. Table 4.14, *Applicable Objectives and Policies of the Hollywood Community Plan*, sets forth the Community Plan's goals and policies for commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals and policies of the Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

Table 4.14
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Polices	Would the Project Conflict?
Objective 1. To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**No conflict.** The Project is composed of a five-story creative office building built above a subterranean garage. The Project includes the demolition of the existing one-story, approximately 8,473 square-foot commercial building with a total of 32 employees, per the applicant, and the construction of a new, 69,146 square-foot office building with 647 square foot retail space. Two buildings with a total of 17,134 square feet of existing creative office would remain on the northern portion of the Project Site. These two buildings have a total of 106 employees per the applicant. The Project would generate a net increase of approximately 244 employees on the Project Site. The Project would further employment services in the area.
Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas	**No conflict.** The Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. As indicated in the Initial Study, Utilities Section, the Project's impacts would be less than significant. Project Site improvements include planting at grade along the facades on West Melrose Avenue and North Seward Street as well as on the upper level terraces, and planting on the north side of the building in and near the shared plaza. This shared plaza between the Project and the existing creative office space to the north will be delineated from the surface parking and valet through plantings as well as ground pavers. Planting along North Seward Street and West Melrose Avenue will connect the future tenant interior and exterior space. A total of 12 trees will be provided as part of the Project. The Project will also provide 2,870 square feet of landscaping. Landscaping would be added to the pocket courtyard, pocket patio, decks, and on West Melrose Avenue and at the North Seward Street entrance.

Table 4.14
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Polices	Would the Project Conflict?
	The Project will not be open to the public, thus no LAMC code required open space, recreational space is required. The Project will provide 11,325 square feet of non-required open space for the proposed tenants. This open space includes the pocket courtyard, pocket patio, and the decks which would reduce the potential for additional demand to be placed on public parks and open space areas.
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**No conflict.** While this is a citywide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area and designated HQTA and TPA that is well-served by public transit provided by Metro and Los Angeles Department of Transportation (LADOT). The Project would include various streetscape improvements such as additional street trees and landscaping to encourage walkability. Furthermore, the Project would provide approximately short- and long-term bicycle parking spaces, per LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.
Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	**No conflict.** There is currently no open space on the Project Site and the Project would not conflict with this objective.
Circulation	
No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated.	The Project would require a Zone Change and Height District Change as follows: Lot located at the northwest corner of West Melrose Avenue and North Seward Street (6101-6117 West Melrose Avenue): From C4-1XL to CM-2. All other Project Site lots (713-733 North Seward Street): From CM-1VL to CM-2. As discussed in the Transportation Section, of this Initial Study, the existing highways and public transportation infrastructure would have adequate capacity to serve the Project.
Service Systems	
No increase in density shall be effected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	The Project would require a Zone Change and Height District Change as follows: Lot located at the northwest corner of West Melrose Avenue and North Seward Street (6101-6117 West Melrose Avenue): From C4-1XL to CM-2. All other Project Site lots (713-733 North Seward Street): From CM-1VL to CM-2.

Table 4.14
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Polices	Would the Project Conflict?
	As discussed in the Public Service and Utilities Sections, of this Initial Study, the Project would not result in significant impacts to public services and utilities. In addition, compliance with regulatory measures would ensure that public services and utilities would have adequate capacity to service the Project.
Source: City of Los Angeles, Hollywood Community Plan, December 1988. EcoTierra Consulting, 2021.	

Although the Project would exceed 30 and 45 feet in height, based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. **Therefore, the Project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant.**

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a regionally-important mineral resource and the project converted an existing or potential future regionally-important mineral extraction use to another reuse or if the project affected access to a site used or was potentially available for regionally-important mineral resource extraction.

The Project Site is fully developed and no oil wells are present.[95][96] Additionally, the Project Site is not located within the boundaries of a major oil drilling area or within a State-designated oil field. The State Geologist classifies mineral resource zones (MRZs) within a region based on the following factors:

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- 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.
- MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.

[95] *City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed January 2021.*

[96] *California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, accessed January 2021.*

- MRZ-4: Areas where available information is inadequate for assignment of any other MRZ category.

Four major MRZ-2s are identified in, or partially within the unincorporated areas of Los Angeles County: Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area.[97] The Project Site is not located within an mineral resource zone (MRZ-2 zone). The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. **Therefore, no impact would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As discussed above under responses to Checklist Question XII(a), the Project Site is not within a major drilling area or State-designated oil field, or within an MRZ-2 zone. The Project would not affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. **Therefore, no impact would occur, and no mitigation measures are required.**

[97] *County of Los Angeles General Plan, Chapter 9: Conservation and Natural Resources Element, 1980, accessed January 2021.*

XIII. NOISE

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

Noise data was generated for the Project to assist in the preparation of the following noise analysis and is included as Appendix G to this document.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal,

state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 decibels (dBA) CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

Goal A city where noise does not reduce the quality of urban life.

Objective 1 Reduce airport and harbor related noise impacts.

Objective 2 Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Objective 3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. Office buildings, business and professional commercial uses, such as the Project, is considered conditionally acceptable with unmitigated exterior noise levels of less than 77 dBA CNEL. For

conditionally acceptable exterior noise levels, new construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as HVAC equipment and trash enclosure activity are typically evaluated against standards established under a jurisdiction's Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from commercial noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Section 114.03 prohibits loading or unloading any vehicle, or operate dollies, carts, forklifts, or other wheeled equipment causing impulsive sound, raucous or unnecessary sound within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M of the following day. Also, Section 114.06 prohibits installation, operation or use of any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.

City of Los Angeles Construction Noise Standards

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment.

However, the above limitation does not apply where technically infeasible (i.e., the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Operational Stationary-Source Noise

- If the Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (as specified in the Table on page I.2-4 of the *L.A. CEQA Thresholds Guide*, Community Noise Exposure), or;

- If Project-related operational (stationary source) noise levels exceed the exterior ambient noise levels at adjacent sensitive receiver locations by 5 dBA Leq (LAMC § 112.02).

Construction Noise and Vibration

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate construction noise:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*

- *Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*

- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00* The City currently does not have significance criteria to assess vibration impacts during construction. Thus, Federal Transit Administration (FTA) guidelines set forth in FTA's Transit Noise and Vibration Assessment, dated September 2018, are used to evaluate potential impacts related to construction vibration for both potential building damage and human annoyance. The FTA guidelines regarding construction vibration are the most current guidelines and are commonly used in evaluating vibration impacts.

Based on this FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

- Project construction activities cause ground-borne vibration levels to exceed 0.5 PPV at the nearest off-site reinforced-concrete, steel, or timber building.

- Project construction activities cause ground-borne vibration levels to exceed 0.3 PPV at the nearest off-site engineered concrete and masonry building.

- Project construction activities cause ground-borne vibration levels to exceed 0.2 PPV at the nearest off-site non-engineered timber and masonry building.
- Project construction activities cause ground-borne vibration levels to exceed 0.12 PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Based on FTA guidance, construction vibration impacts associated with human annoyance would be significant if the following were to occur (applicable to frequent events; 70 or more vibration events per day):

- Project construction activities cause ground-borne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential and hotel uses.
- Project construction activities cause ground-borne vibration levels to exceed 65 VdB at off-site studio (recording/broadcast) uses.

Existing Noise Level Measurements

To assess the existing noise level environment, four short-term, 15-minute noise level measurements were taken at sensitive receiver locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. The 15-Minute Noise Measurement Datasheet (see Appendix G) provides the location of the Project site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected on May 20, 2021.

Measurement Procedure and Criteria

The noise measurements were taken using the Larson Davis SoundTrack LxT2 sound level meter, which conforms to industry standards set forth in American National Standard Institute (ANSI) S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1, and is consistent with the requirements specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above the ground. The sound level meter was programmed to record the average sound level (Leq) over a period of 15 minutes in accordance with LAMC Section 111.01(a).

Noise Measurement Locations

The short-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the Project Site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the*

express intent of the analyst to measure these sources. Further, FTA guidance states, *it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community*.

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before- and after-Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

Noise Measurement Results

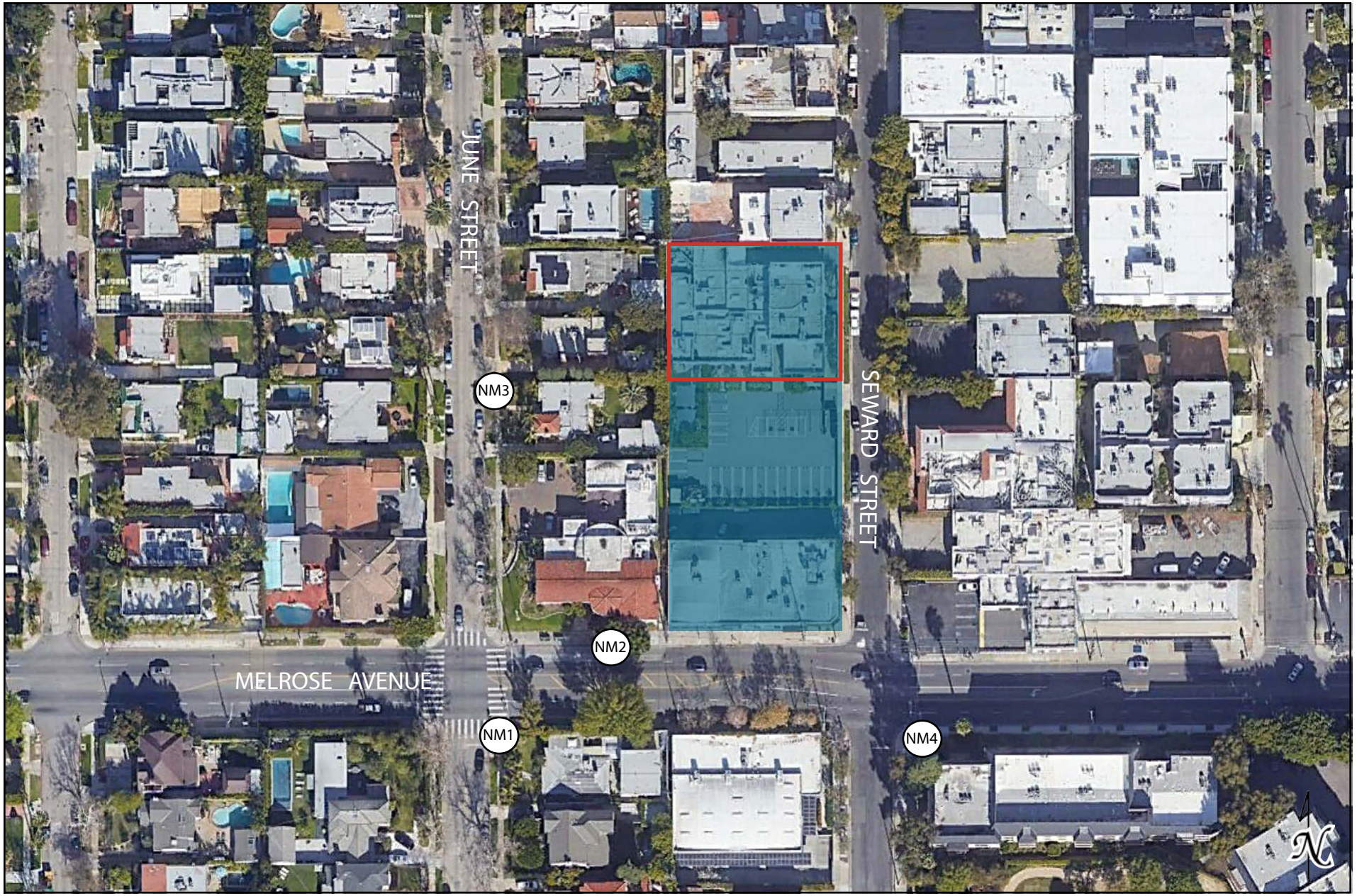
The results of the measurements are summarized in Table 4.15, *Existing Ambient Noise Levels*. The noise monitoring outputs are provided in Appendix G of this document. See Figure 4.1, *Noise Measurement Locations*.

Table 4.15
Existing Ambient Noise Levels

Noise Measurement Location	Location	Primary Noise Sources	Noise Levels[a]		
			L_{eq}	L_{max}	L_{min}
NM1	Adjacent to the residential use at 646 N June St.	Traffic along Melrose Ave and June St, pedestrians, and aircraft.	70.9	88.0	53.0
NM2	On the sidewalk adjacent to the John C. Fremont Library	Traffic along Melrose Ave and June St. pedestrians, and aircraft	73.5	88.5	53.9
NM3	On the sidewalk adjacent to residential use at 716 N. June St.	Light traffic along June St, birds, aircraft.	57.5	70.1	48.0
NM4	Adjacent to the Hancock Park Terrace apartments on the south side of Melrose Avenue	Traffic along Melrose Ave and Seward St. pedestrians, and aircraft.	74.6	89.4	56.8

[a] *Noise measurements were taken on May 20,2021 at each location for a duration of 15 minutes.*
See Appendix of G this document for noise data.
Source: EcoTierra, 2021.

As shown in Table 4.15, the ambient recorded noise levels range from 57.5 dBA Leq to 74.6 dBA Leq in the Project vicinity.



Project Site Existing Buildings to Remain

Source: EcoTierra Consulting, June 2021.

Figure 4.1
Noise Measurememt Locations

Construction Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project.

The City of Los Angeles General Plan Noise Element defines noise-sensitive uses as: *single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks*. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

Construction Noise Levels

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Demolition
- Grading/Excavation
- Foundation
- Building Construction
- Architectural Coating

The Project is anticipated to start demolition no sooner than November 2021, and construction is anticipated to last approximately 21 months with final buildout occurring around July 2023.

The closest sensitive receptors to the Project Site include:

- The residential uses located at 646 and 646N North June Street, south of the site (across West Melrose Avenue) approximately 92 feet from the Project boundary (NM1),
- The John C. Freeman Branch Library located at West 6121 Melrose Avenue, approximately 8 feet to the west of the site (NM2),
- The residential uses located at 716 North June Street (north of West Melrose Avenue), approximately 8 feet from the Project boundary (NM3), and
- Hancock Park Terrace apartments located at 647 North Wilcox Avenue (east of North Seward Street, south of West Melrose Avenue) approximately 130 feet from the Project boundary (NM4).

Other noise sensitive land uses are located further from the Project Site and would experience lower impacts. Construction and demolition noise will vary depending on the construction

process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

A summary of noise level data for a variety of construction equipment compiled by the FTA is presented in Table 4.16, *Noise Range of Project Construction Equipment*. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings.

Table 4.16
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical use Factor (%)	Typical Noise Level @ 50ft (Lmax dBA)
Compressor (air)	No	40	78
Concrete Mixer Truck	No	40	79
Concrete Pump	No	20	81
Concrete Saw	No	20	90
Crane	No	16	81
Drill Rig	No	20	79
Dozer	No	40	82
Forklift [a, b]	No	50	61
Front End Loader	No	40	79
Generator	No	50	81
Grader	No	40	85
Haul/Dump Truck	No	40	76
Paver	No	50	77
Pickup Truck	No	50	77
Roller	No	20	80
Tractor/Loader Backhoe	No	40	79
Welder/Torch	No	40	74

[a] *Warehouse & Forklift Noise Exposure - NoiseTesting.info Carl Stautins, November 4, 2014 http://www.noisetesting.info/blog/carl-strautins/page-3/*
[b] *Data provided Leq as measured at the operator. Sound Level at 50 feet is estimated.*
Source: FHWA RCNM User's Guide, 2006.

Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. Distances to receptors were based on the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. The highest noise levels during each construction phase at the closest receptors (located adjacent to NM1 [southwest], NM2 [west], NM3 [west]), and NM4 (southeast) are presented in Table 4.16, and worksheets are included as Appendix G to this

document. Construction noise levels are compared to existing noise levels, which are shown in Table 4.16 above.

As defined by the Section 41.40 of the LAMC, a project would normally have a significant impact on noise levels from construction if construction activity (including demolition) or repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, occurs between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, or between 6:00 P.M. and 8:00 A.M. on Saturday. Per Section 112.05 of the LAMC, a significant impact on noise levels from construction could also occur if equipment is operated in a manner that causes it to exceed 75 dBA at a distance of 50 feet, between the hours of 7:00 A.M. and 10:00 P.M.

The above noise level limitations do not apply where compliance is deemed to be technically infeasible, which means that said noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction techniques during the operation of the equipment.

The highest unmitigated Project construction noise levels at the nearest sensitive receptors during construction are shown in Table 4.17, *Unmitigated Construction Noise Levels at Closest Receptor Locations*. As shown in Table 4.17, the highest construction noise levels, which would occur during the demolition phase, would result in significant noise increases at two sensitive receptor locations, NM2 and NM3, which are located adjacent to the western boundary of the Project Site.

Table 4.17
Unmitigated Construction Noise Levels at Closest Receptor Locations

Off-Site Receptor Location	Existing Ambient Noise Levels (Leq)[a]	Maximum Unmitigated Construction Noise Levels[b]	Applicable Standard (dBA)[c]	Exceeds Standard?
(NM1) The residential uses located at 646 and 646 North June Street, south of the site (across West Melrose Avenue)	70.9	72.9	75.9	No
(NM2) The John C. Freeman Branch Library located at 6121 West Melrose Avenue, approximately 8 feet to the west of the site	73.5	81.5	78.5	**Yes**
(NM3) The residential uses located west of the site, at 716 North June Street (north of West Melrose Avenue)	57.5	76.4	62.5	**Yes**
(NM4) Hancock Park Terrace apartments located at 647 North Wilcox Avenue (east of North Seward Street, south of West Melrose Avenue)	74.6	71.6	79.6	No

[a] *Noise measurement locations are shown on Figure 4.1.*
[b] *Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix G.*
[c] *The applicable LAMC standard is the daytime ambient noise levels plus 5 dBA_{leq}.*
Source: EcoTierra, 2021.

Without mitigation, construction noise levels at sensitive receptors located closest the Project Site may reach up to 81.5 dBA Leq, which would exceed the 75 dBA construction noise level defined by the Section 41.40 of the LAMC. Furthermore, per the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on noise levels from construction if:

> *Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use.*

As shown in Table 4.17, modeled, unmitigated construction noise levels could have an increase of up to 18.9 dBA over ambient noise levels at the single-family residential use located west of the Project Site (NM3, 716 North June Street) during demolition, grading/excavation, foundation and building construction. An increase in ambient noise of up to 8.0 dBA over ambient noise levels would also occur at the library use (NM2), located at 6121 West Melrose Avenue during demolition. Therefore, mitigation is required to reduce construction noise impacts at those receptor locations.

As shown in Table 4.18, *Mitigated Construction Noise Levels at Impacted Receptor Locations*, mitigation that would provide at least 14 dBA of noise reduction during the demolition, grading/excavation, foundation and building construction phases would reduce the construction noise level down to 62.4 dBA Leq or lower, with a 5 or less dBA increase over existing noise levels at the affected residential sensitive receptor located west of the site, and reduce the construction noise level down to 67.5 dBA Leq, which would result in noise levels lower than the ambient noise level at the library receptor (NM2). Construction-related noise impacts at sensitive receptor locations NM1 to the southwest, NM4 to the southeast, and those located further from the Project would not experience a significant increase in ambient noise levels during any phase of construction (please see Construction Noise Calculation Worksheets available in Appendix G for details).

Table 4.18
Mitigated Construction Noise Levels at Impacted Receptor Locations

Off-Site Receptor Location	Existing Ambient Noise Levels (Leq)[a]	Maximum Mitigated Construction Noise Levels[b]	Applicable Standard (dBA)[c]	Exceeds Standard ?
(NM2) The John C. Freeman Branch Library located at 6121 Melrose Avenue, approximately 8 feet to the west of the site	73.5	67.5	78.5	**No**
(NM3) The residential uses located west of the site, at 716 N. June Street (north of Melrose Avenue)	57.5	62.4	62.5	**No**

[a] *Noise measurement locations are shown on Figure 4.1.*
[b] *Reflects noise level reduction from shielding that would provide at least a 14 dBA reduction. Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix G.*
[c] *The applicable LAMC standard is the daytime ambient noise levels plus 5 dBA_{leq}.*
Source: EcoTierra, 2021.

With incorporation of **MM NOI-1**, the noise generated during the demolition, grading/excavation, foundation and building construction of the Project would no longer exceed 75 dBA and will not exceed existing ambient exterior noise levels by 5 dBA or more during construction activities lasting more than 10 days in a three-month period. **Therefore, with incorporation of mitigation measure MM NOI-1, construction noise impacts would be less than significant.**

The following mitigation measure is recommended to reduce construction-related noise levels to a less than significant level.

Mitigation Measures

MM NOI-1: During all Project Site demolition, grading/excavation, foundation and building construction, the construction contractors shall install a temporary, continuous sound barrier along the western boundary of the Project Site. The barrier shall be tall enough to break the line-of-site between construction activity and the adjacent library and residential use, and be constructed of materials achieving a Transmission Loss (TL) value of at least 14 dBA, such as ½ inch plywood.[98] The supporting structure shall be engineered and erected according to applicable codes.

Off-Site Construction Noise Impacts

The highest potential for off-site construction noise is sourced from hauling trips. During the demolition duration of 20 days, the Project would generate approximately 4 haul truck trips per day (2 inbound, 2 outbound) travelling to and from the Project Site. During the grading/excavation duration of 50 days, the Project would generate approximately 70 haul truck trips per day (35 inbound, 35 outbound) travelling to and from the Project Site. The anticipated outbound haul route from the Project Site would be along Melrose Avenue to Normandie Avenue, to the 101 freeway. Approximately 29,400 cy of soil will be excavated and exported from the Project Site. There are multi-family residential units, commercial uses and a few scattered single-family dwellings along the route. Building frontages along the haul route are located approximately 40 feet or more from the roadway center line. As shown in Table 4.17 above, typical noise from haul trucks driving by can reach up to 76 dBA Lmax at a distance of 50 feet. As shown in Table 4.16 above, the existing, daytime maximum noise for Melrose Avenue is 89.4 dBA Lmax. Therefore, the noise level generated by a Project haul truck passing by would be less than the existing, ambient noise levels at receptor locations along haul route roadway segments. **Therefore, impacts from off-site construction noise would be less than significant and no mitigation measures are required.**

Off-Site Operational Noise Impacts

Existing and Existing Plus Project traffic noise levels were modeled utilizing the Federal Highway Administration (FHWA) Traffic Noise Prediction Model - FHWA-RD-77-108 at a distance of 50

[98] *Based on the FHWA Noise Barrier Design Handbook (July 14, 2011), see Table 3, Approximate sound transmission loss values for common materials; ½ inch plywood has a transmission loss of 20 dBA.*

feet from roadway centerline. The uniform distance allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. These worksheets are included as Appendix G. The modeling is theoretical, and is considered conservative because it does not account for any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference in with and without Project conditions. Roadway input parameters are based on ADTs, speeds, and vehicle distribution data. The potential off- site noise impacts caused by an increase of traffic volumes from operation of the Project on the nearby roadways were calculated for the following scenarios:

Existing refers to existing year 2021 traffic noise conditions. *Existing Plus Project* refers to existing year 2021 traffic noise conditions plus traffic generated by the Project. Both scenarios are demonstrated in Table 4.19, *Off-Site Traffic Noise Impacts– Existing With Project Conditions*.

Table 4.19
Off-Site Traffic Noise Impacts – Existing With Project Conditions

Noise Levels 50 feet from Roadway Centerline*						
	Existing (2021)		Existing Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant ?
Willoughby Avenue						
w/o Highland Ave	2,940	62.4	2,970	62.4	0.0	**No**
e/o Highland Ave	4,850	64.6	4,880	64.6	0.0	**No**
Melrose Avenue						
w/o Highland Ave	11,790	68.4	11,900	68.5	0.1	**No**
e/o Highland Ave	12,680	68.7	12,700	68.7	0.0	**No**
w/o Wilcox Ave	10,900	68.1	10,940	68.1	0.0	**No**
e/o Wilcox Ave	12,510	68.7	12,650	68.7	0.0	**No**
Highland Avenue						
n/o Willoughby Ave	13,420	69.0	13,530	69.0	0.0	**No**
s/o Willoughby Ave	13,680	69.1	13,690	69.1	0.0	**No**
s/o Melrose Ave	14,050	69.2	14,160	69.2	0.0	**No**
Wilcox Avenue						
n/o Melrose Ave	2,600	61.8	2,600	61.8	0.0	**No**
s/o Melrose Ave	3,420	63.0	3,450	63.1	0.1	**No**

Notes: ADT = average daily trips, dB = decibels, CNEL = community noise equivalent level
* *The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.*
Source: EcoTierra, 2021.

As defined in the *L.A. CEQA Thresholds Guide*, and the *Noise Element of the Los Angeles City General Plan* threshold standards, a project would normally have a significant impact on noise

levels from operations if the ambient noise level measured at the property line of affected uses were to increase by 3 dBA in CNEL to within the "normally unacceptable" or clearly unacceptable" category (as shown in the Table on page I.2-4 of the *L.A. CEQA Thresholds Guide*, Community Noise Exposure), or any 5 dBA or greater noise increase. To be conservative, the 3 dBA standard has been used.

As shown in Table 4.19, Project generated vehicular trips from all of the modeled roadway's segments would result in an increase in ambient noise levels of 0.1 dBA[99] over the Existing scenario, and would not exceed the *City of Los Angeles CEQA Threshold* or the *Noise Element* threshold standards presented above. **Therefore, traffic noise impacts to off-site receptors due to Project generated trips would be less than significant and no mitigation measures are required.**

On-Site Operational Noise Impacts

This section analyzes the potential on-site operational noise impacts due to the Project's stationary noise sources.

Parking Noise

The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Activity levels are anticipated to be higher in the early morning and evening when the largest number of employees would enter and exit. However, these events would occur at low exiting and entering speeds, which would not generate high noise levels. During these times, the noise levels can range from 44 to 63 dBA Leq[100]. As the parking area would be enclosed in a subterranean parking garage, except for the driveway areas, noise generated from within the parking area would not adversely affect off-site sensitive receptors. Furthermore, operational noise generated by motor vehicles within the Project Site is regulated under the LAMC. Specifically, Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of the property to exceed the ambient noise level by more than five decibels. LAMC Section 114.06 prohibits any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes. LAMC Section 114.03 prohibits loading or unloading of any vehicle, operating any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. of the following day. **Therefore, through project design and compliance with**

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[99] *As the increase in noise levels is 0.1 dBA CNEL at 50 feet from the centerline, it would also be an increase of 0.1 dBA CNEL at the property line of affected uses.*

[100] *Source: Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.*

existing LAMC regulations, noise impacts associated with parking would be less than significant and no mitigation measures are required.

Stationary Noise Sources

As part of the Project, HVAC units, and exhaust fans would be installed for the proposed uses. Although the operation of this equipment would generate noise, the design of all mechanical equipment would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels. **Therefore, impacts related to stationary noise sources would be less than significant with compliance with existing LAMC regulations. No mitigation measures are required.**

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth,

the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Standards

The City's General Plan and Municipal Code do not identify specific vibration level standards. Therefore, applicable vibration standards identified by the Caltrans Transportation and Construction Vibration Guidance Manual were used in the analysis. The vibration damage criteria adopted by the FTA are shown in Table 4.20, *Construction Vibration Damage Criteria*.

Table 4.20
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories:

(1) Vibration Category 1 – High Sensitivity,

(2) Vibration Category 2 – Residential, and

(3) Vibration Category 3 – Institutional.

The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The vibration criteria associated with human annoyance for these three land-use categories are shown in Table 4.21, *Groundborne Vibration Criteria for General Assessment*. No thresholds have been adopted or recommended for commercial or office uses.

Significance Criteria

Vibration impacts shall be considered significant if any of the following occur as a direct result of the Project.

- If short-term Project generated construction vibration levels exceed the FTA building damage vibration criteria listed in Table 4.20 or the FTA human annoyance standards for frequent events listed in Table 4.21.

Table 4.21
Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events	Occasional Events	Infrequent Events
Category 1	65 VdB	65 VdB	65 VdB
Category 2	72 VdB	75 VdB	80 VdB
Category 3	75 VdB	78 VdB	83 VdB
Per FTA Transit Noise and Vibration Impact Assessment, September 2018, page 8-1, infrequent events are fewer than 30 vibration events of the same kind per day. Occasional events are between 30 and 70 vibration events of the same source per day. Frequent events are more than 70 vibration events of the same source per day. *Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.*			

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Table 4.22, *Construction Equipment Vibration Source Levels* identifies various PPV levels for the types of construction equipment that would operate during the construction of the Project. For example, as shown in Table 4.22, a vibratory roller could generate up to 0.21 PPV at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV) at a distance of 25 feet (two of the most vibratory pieces of construction equipment). Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 PPV. It should also be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table 4.22
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, Table 7-4. September 2018.

Annoyance to Persons

The primary effect of perceptible vibration is often a concern. However, secondary effects, such as the rattling of a china cabinet, can also occur, even when vibration levels are well below perception. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is running on a treadmill. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

The nearest off-site buildings are existing creative office uses located adjacent to the northern portion of the Project Site. Per the FTA Transportation and Construction Vibration Guidance Manual (May 2018), land uses sensitive to vibration include: buildings where people normally sleep, such as dwelling units, hotels, and hospitals; research and manufacturing facilities that are vibration-sensitive such as hospitals with vibration-sensitive equipment and universities conducting physical research operations; and institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, and doctors' offices. Further, the FTA states that commercial or industrial locations including office buildings are not included in this category, unless there is vibration-sensitive activity or equipment within

the building. Therefore, annoyance-based vibration impacts to the existing creative office commercial use located adjacent to the northern portion of the Project Site, would be considered less than significant.

As shown in Table 4.22, vibration from frequent events can be annoying to Category 2 uses (and any buildings where people sleep) at a level 72 VdB. Per the CalEEMod modeling (provided in Appendix A), a large bulldozer and caisson drill would be the most vibratory pieces of equipment expected to be used at the Project Site. Vibration worksheets are provided in Appendix G of this document.

The nearest sensitive receptors to the Project Site boundary would be the John C. Fremont Branch Library, located approximately 8 feet west of the Project Site, and the residential use located at 716 North June Street, located approximately 50 feet west of the Project Site. To be conservative, this distance represents the closest a piece of equipment could come to the building façade of the sensitive receptors as the equipment passes by the Project boundary. Other vibration sensitive land uses are located further from the Project Site and would experience lower impacts.

At a distance of 8 feet, use of a large bulldozer or caisson drill would be expected to generate 101.9 VdB[101] and at 50 feet, the use of a bulldozer or caisson drill would be expected to generate 78 VdB[102]. As detailed in Table 4.22 above, the level at which human annoyance could occur from infrequent events would be approximately 72 VdB for residential uses; 75 VdB for institutional uses, such as the library. As the use of a large bulldozer or caisson drill at 8 feet from the library uses and 50 feet from the residential use would exceed the 75 VdB threshold for Category 3 land uses and 72 VdB for Category 2 land uses respectively, mitigation is required.

At a distance of 80 feet, use of a large bulldozer or caisson drill would generate a VdB of 71.9 and at a distance of 63 feet, use of a large bulldozer or caisson drill would generate a VdB of 74.96. Therefore, with incorporation of mitigation measure **MM NOI-2** below, which restricts use of a large bulldozer or caisson drill within 80 feet of the façade of the residential use located west of the site, at 716 North June Street and within 63 feet of the façade of the John C. Fremont Branch Library, annoyance-based vibration levels would no longer exceed vibration annoyance thresholds. **Therefore, with implementation of MM NOI-2, annoyance-based vibration impacts to the closest sensitive uses located west of the site, would be reduced to a level of less than significant.**

The following mitigation measure is recommended to reduce the annoyance to sensitive receptors from construction-related vibration levels to the maximum extent feasible.

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[101] *Based on the 2018 FTA Transit Noise and Vibration Impact Assessment Manual vibration equation 7-3: Lv.distance = Lvref – 30 log (D/25), where Lv.distance is the vibration level adjusted for distance, VdB; Lvref is the source reference vibration level at 25 feet, VdB; and D = distance from the equipment to the receiver. Page 185.*

[102] *Ibid.*

Mitigation Measures

MM NOI-2: The construction contractor shall avoid using large bulldozer or caisson drill within 80 feet of the façade of the residential use located west of the Project Site at 716 North June Street and within 63 feet of the façade of the John C. Fremont Branch Library located west of the Project Site.

Architectural Damage

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

Table 4.22, above, identifies a PPV level of 0.2 as the threshold at which there is a risk to non-engineered timber and masonry buildings. The building façade of the existing creative offices to the north of the Project is located approximately 5 feet from the Project boundary. The building façade of the garage belonging to the closest residential use and the façade of the John C. Fremont Branch Library are located approximately 8 feet west of the Project Boundary. At a distance of 5 feet, a large bulldozer or caisson drill would generate 0.995 in/sec PPV. At a distance of 8 feet, the vibration level would be 0.492 in/sec PPV (please see vibration calculations available in Appendix G for details). Therefore, vibration damage to the closest buildings could potentially occur during construction of the Project.

As shown in Table 4.20, above, the FTA's the vibration criteria for potential structural damage to FTA Building Category III – Non-engineered timber and masonry buildings is 0.2 in/sec PPV.[103] At a distance of 15 feet from building facades, the vibration level from a large bulldozer or caisson drill is 0.191 in/sec PPV. Therefore, to avoid the potential for any structural damage to the adjacent buildings during construction, a bulldozer or caisson drill must not be operated within 15 feet of the facades of existing buildings. **With the implementation of mitigation measure MM NOI-3, impacts from groundborne vibration would be reduced to a level of less than significant.**

The following mitigation measure is recommended to reduce construction-related vibration levels to the maximum extent feasible.

Mitigation Measures

MM NOI-3: The construction contractor shall avoid using large bulldozers or caisson drills within 15 feet of the buildings directly adjacent to the Project boundaries.

MM NOI-2 and **MM NOI-3** require that heavy machinery (excavators, bulldozers, caisson drills) is to be operated at least 80 feet of the façade of the residential use located west of the Project Site at 716 North June Street and within 63 feet of the façade of the John C. Fremont Branch Library located west of the Project Site. Construction activity that must occur within these distances to

[103] *FTA, Transit Noise and Vibration Impact Assessment. 2018.*

the residential and library buildings' façades would need to be performed with smaller equipment types that do not exceed the vibration thresholds applied herein. As shown in above, the estimated maximum vibration levels for the construction of the proposed Project with the use of required setback distance mitigation measures (**MM NOI-2**) would be less than significant. Furthermore, the compliance with the setback distance detailed in **MM NOI-2** will also reduce the potential for architectural damage to adjacent structures from construction-related vibration, as the buffer distances required to reduce annoyance-related vibration impacts are greater than the buffer distance needed to reduce architectural-related vibration impacts. In summary, during the construction of the proposed Project, setback distance attenuation during construction would reduce the vibration levels to a less than significant level with the incorporation of Mitigation Measure MM NOI-2.

With incorporation of mitigation measure MM NOI-2 and MM NOI-3, annoyance-based vibration impacts to sensitive receptors closest to the site and vibration impacts to buildings adjacent to the Project Site will be less than significant.

Operational Vibration

The Project proposes the construction of a new five-story, approximately 77'-9"-foot tall (73'-6"-foot tall to the top of the parapet), 67,889 square-foot, creative office building on top of a subterranean parking structure. The Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. **As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are required.**

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

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

The Project Site is located approximately 11.1 miles south of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for

commercial airports such as the Hollywood-Burbank Airport).[104] Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[105] **Therefore, no impacts would occur, and no mitigation measures are required.**

[104] *Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.*

[105] *Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; accessed: April 2021.*

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The Project would involve the demolition of approximately 8,473 square-foot commercial building and the construction of a new, 69,146 square-foot office building with 647 square foot retail space. Two buildings with a total of 17,134 square feet of existing creative office would remain on the northern portion of the Project Site. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, construction workers on the Project would not represent unplanned population growth, either directly or indirectly. **Impacts on population and housing due to Project construction activities would be less than significant, and no mitigation measures are required.**

Operation

Employment

The Project includes the demolition of the existing one-story, approximately 8,473 square-foot commercial building with a total of 32 employees, per the applicant, and the construction of a new, 69,146 square-foot office building with 647 square foot retail space. Two buildings with a total of 17,134 square feet of existing creative office would remain on the northern portion of the Project Site. These two buildings have a total of 106 employees per the applicant.

Table 4.23, *Project Net Employee Generation*, shows the actual estimated number of employees after implementation of the Project.

Table 4.23
Project Net Employee Generation

Land Use	Size	Generation Rate	Employees[a]
Office	68,499 sf	.004 employees/sf	274
Retail	647 sf	0.002 employees/sf	2
Project Total			**276**
Less Existing Uses to be demolished Total			*32*
Project Net Total			***244***

Notes: sf = square feet
[a] *The number of employees does not include the Two buildings with a total of 17,134 square feet of existing creative office that have a total of 106 employees per the applicant.*
Source for generation rate: City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020. Accessed April 19, 2021.
Source: EcoTierra Consulting Inc. 2021.

As shown in Table 4.23, the Project would generate a net increase of approximately 244 employees on the Project Site.

As shown in Table 4.24, *Population, Housing, and Employment Forecasts for the City of Los Angeles Subregion*, SCAG estimates that there will be 4,135,995 residents, 1,469,828 total housing unit, and 1,917,721 jobs in the City in 2023 at project buildout.

Moreover, SCAG's RTP/SCS estimates the population of the City will increase to 4,771,300 residents by 2045. Housing in the City is estimated by SCAG to increase to 1,793,000 housing units by 2045. Employment in the City is estimated by SCAG to increase to 2,135,900 jobs by 2045.

Table 4.24
Population, Housing, and Employment Forecasts
for the City of Los Angeles Subregion

Area	Population	Households	Employment
City of Los Angeles			
SCAG Forecasts			
2016	3,933,800	1,367,000	1,848,300
2023	4,135,955	1,469,828	1,917,721
2045	4,771,300	1,793,000	2,135,900
Percent Change (%)			
2020 to 2023	+5.1	+7.5	+3.8
2020 to 2045	+15.1	+22.0	+11.4
Source: *Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast, Table 14, September 3, 2020.*			

With respect to employment, the Project would result in a net increase of 244 jobs to the area Estimates extrapolated from SCAG data projects the Citywide job supply to increase by 69,421 jobs between 2016 and 2023, and by 218,179 jobs between 2023 and 2045. The addition of 244 proposed jobs would be within the growth anticipated based on SCAG projections, representing approximately 0.3 percent of the Citywide total jobs for the period of 2016 to 2023, and approximately 0.1 percent of the Citywide total growth for the period of 2016 to 2045. This increase is within the anticipated job based on SCAG projections for employment and would therefore not represent unplanned growth within the City of Los Angeles. As such, job growth associated with the Project would be less than significant and no mitigation measures are required.

Housing

The Project Site is currently a commercial lot and does not include residential units, thus the Project would not result in the displacement of housing. As shown in Table 4.24, the Project would result in a net increase of 244 employees on the Project Site to work at the Project which could include a range of full-time and part-time positions. It is not anticipated that this would result in induced housing growth on and in the vicinity of the Project Site as it is reasonable to expect that some of the new employees would be drawn from the local labor force within the City of Los Angeles and surrounding cities. It is also possible that some of the employment offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing. However, it is anticipated that some of this demand would be filled by existing vacancies in the housing market and others by any new developments that may occur in the vicinity of the Project Site. Moreover, the Project Site and City of Los Angeles is well-served by existing transit options, which would be readily available for employees to use to commute to and from their jobs at the Project Site. Thus, the Project's potential to induce housing growth from the increase in employees on the Project Site is not considered to be significant due to the readily available local labor force, existing transit opportunities to the Project Site, and the existing and forthcoming housing stock available within the City.

As discussed previously, the Project does not propose the development of residential units. The Project would result in a net increase of 244 employees on the Project Site, which would not result

in a notable increase in the demand for new housing, and any new housing development, should it occur, would be minor in context of forecasted growth in the City of Los Angeles. Therefore, the Project would be within SCAG's Citywide projections for housing unit growth. As such, impacts related to housing growth would be less than significant.

Population

As discussed previously, the Project does not propose the development of residential units. As such, the Project would not result in a notable increase in the population of the City of Los Angeles, and any new development, should it occur, would be minor in context of forecasted growth in the City of Los Angeles. Therefore, impacts related to population growth would be less than significant.

Infrastructure

The Project is located in a developed urbanized area and would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As the Project would be supported by the existing urban infrastructure, the Project would not result in indirect unplanned population growth and impacts would be less than significant. Therefore, impacts of the Project related to unplanned population growth due to infrastructure would be less than significant, and no mitigation measures are required.

Therefore, the impact to substantial unplanned population growth in an area, either directly or indirectly would be less than significant, and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere.

The Project Site currently is developed with a commercial uses and surface parking lots and, thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. **Therefore, no impacts would occur, and no mitigation measures are required.**

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire Protection?	☐	☐	☒	☐
b. Police Protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other Public Facilities?	☐	☐	☐	☒

a) Fire protection?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

The Project Site is served primarily by Fire Station No. 27, located at 1327 North Cole Avenue, approximately 1.0-mile to the northeast of the Project Site.[106] Fire Station No. 27 includes a Task Force Engine and Truck, a Paramedic Ambulance, a Rescue Ambulance, and Urban Search and Rescue, satisfying the engine company 1.0-mile response distance requirement.[107]

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements for industrial and commercial land uses is 6,000 gallons per minute (gpm) to 9,000 gpm from four to six fire hydrants flowing simultaneously. A minimum residual water pressure of

[106] *City of Los Angeles Fire Department, Find Your Station Website, accessed: May 2021.*

[107] *California Fire and EMS, http://www.cafirefighters.com/lafd.htm, accessed May 2021.*

20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 300 feet of all first-story portions of industrial and commercial buildings. The nearest fire hydrant, hydrant No. 35298, is located adjacent to the southeastern corner of the Project Site. The entire Project Site is within 300 feet of this existing hydrant. Additional fire hydrants may be required, depending on the building design and LAFD requirements, as determined by LAFD; however, no new hydrants are anticipated. Such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process and in accordance with all applicable City and LAFD requirements. Construction activities to install any new pipes or pumping infrastructure would be temporary and in short duration. Accordingly, any limited infrastructure-related construction activity would not result in any significant environmental impacts.

Emergency vehicle access to the Project Site would continue to be provided from West Melrose Avenue and North Seward Street. All improvements proposed would comply with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both construction and operation. Accordingly, the Project would not result in any significant impacts to emergency access. Furthermore, construction- or operation-related traffic generated by the Project would not significantly impact LAFD access or response times within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code (CVC) Section 21806.

LAFD has not established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard response time goal of six minutes to nearly all medical emergencies.[108] Based on response metrics from January through March 2021, Fire Station No. 27 had an average response time for non-EMS calls of 5 minutes and 45 seconds, and 6 minutes and 29 seconds for EMS calls.[109] According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. Given the already

[108] *National Fire Protection Association, NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments.*

[109] *City of Los Angeles Fire Department, Fire Stat LA Website, accessed May 2021.*

urbanized nature of the surrounding area, development of the Project is not expected to require the construction of a new or expanded fire station, the construction of which could cause significant environmental impacts. Although there are no known fire station construction or facilities expansion projects planned for the Project area, in the event that the City determines that expanded or new fire facilities are warranted, 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 under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

As detailed above, prior to plan check review, the Project would be required to consult with the LAFD regarding the installation of public and/or private fire hydrants, sprinklers, access, and/or other fire protection features within the Project Site. All required fire protection features would be installed to the satisfaction of the LAFD. **Therefore, for the reasons stated above, impacts related to the construction of new or expanded fire facilities to meet an increase in the demand for protection services would be less than significant and no mitigation measures would be required.**

b) Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective.

The Project would be served by the City of Los Angeles Police Department (LAPD) Wilshire Community Police Station located at 4861 West Venice, approximately 3.5-mile to the southwest of the Project Site. The Wilshire Community Police Station, which is under the jurisdiction of the West Bureau, serves a community area encompassing 13.97 square miles, including the Project Site, and contains a population of approximately 500,000.[110] For the purposes of the LAPD, the Wilshire Community Area boundaries are roughly defined as: La Cienega Boulevard to the west, Willoughby Avenue to the north, to Santa Monica Boulevard to the south, and the Bronson Avenue to the east.[111]

Although the increase in daytime population at the Project Site during construction would be temporary, construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. When not properly secured, construction sites can become a

[110] *Los Angeles Police Department Wilshire Community Police Station, About Wilshire Website, accessed May 2021.*

[111] *Los Angeles Police Department, RD Map of Wilshire Area.*

distraction for local law enforcement from more pressing matters. Accordingly, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site. Temporary construction fencing would be placed 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 keep unpermitted persons from entering the construction area. These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment would not be easily stolen or abused and would minimize the need for LAPD services during construction.

With regard to operation, while current response times, crime statistics, and congestion at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the Project's police service area, the number of residents currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of residents that the Project would introduce to the area. The Project would not include residential uses, and accordingly, would not alter the existing officer-to-population ratio. Furthermore, the potential for crime can be reduced with site-specific designs and features. The Project would include standard security measures such as adequate security lighting and keyed access to the creative office building. In addition, the LAPD will require that the commanding officer of the Community Area be provided a diagram of the property showing access routes, and any additional information that might facilitate police response.

Given the already urbanized nature of the surrounding area, development of the Project is not expected to require the construction of a new or expanded police station, the construction of which could cause significant environmental impacts. Although there are no known police station construction or facilities expansion projects planned for the Project area, in the event that the City determines that expanded or new police facilities are warranted, 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 under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Furthermore, as with fire services, if the demand for police services in a given area increases, it is the LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including police protection services. **Therefore, for the reasons stated above, impacts related to the construction of new or expanded police facilities to meet an increase in the demand for protection services would be less than significant and no mitigation measures would be required.**

c) Schools?

No Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The Project would have less than significant impacts on schools because it would be subject

California Government Code Section 65995, which allows Los Angeles Unified School District (LAUSD) to collect impact fees from developers of new residential developments.

The Project includes demolition and removal of the existing building and surface parking lots from the Project Site and development of the Site with a creative office building . The Project does not include any housing and would not employ a significant number of employees; therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. **Therefore, no impacts related to an increased demand for school facilities would be occur under the Project and no mitigation measures would be required.**

d) Parks?

No Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project includes demolition and removal of the existing commercial building and surface parking lots from the Project Site and development of the Project Site with a creative office building. The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for park services would be negligible. The Project will provide 11,325 square feet of non-required open space for the proposed tenants. This open space includes the pocket courtyard, pocket patio, and the decks. **Therefore, no impacts related to an increased demand for park facilities would occur under the Project and no mitigation measures would be required.**

e) Other public facilities?

No Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The Project Site would be served by the John C. Fremont Branch Library. The John C. Fremont Branch Library, which is located at 6121 West Melrose Avenue, Los Angeles, adjacent to the Project Site.

The Project includes demolition and removal of the existing commercial building and surface parking lots from the Project Site and development of the Project Site with a creative office building. The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for public facilities would be negligible. The Los Angeles Public Library System (LAPL) provides library services at the Central Library, 7 reginal branch libraries, 56 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles. The Project is not expected to create a demand for library services as no new residential population would be generated. As such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. **Therefore, no impacts**

related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures would be required.

XVI. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. A significant impact may occur if a project includes substantial population growth which could generate a demand for parks or recreational facilities that exceed the capacity of existing parks or recreational facilities and causes premature deterioration of the facilities. As discussed in Question 15(a)(iv), the project would…

Project proposes the construction of a 67,889 square-foot, creative office building. Although the Project would include some employment, and the Project would only incrementally increase the number of employees in the area that use parks and recreational facilities in the area. This limited number of new park users would not result in substantial physical deterioration of park facilities. In addition, the Project will provide 11,325 square feet of non-required open space for the proposed tenants. This open space includes the pocket courtyard, pocket patio, and the decks. **Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As discussed in Question 15(a)(iv), the Project proposes the construction of a 67,889 square-foot, creative office building. Although the Project would include some employment, and the Project would only incrementally increase the number of employees in the area that use parks and recreational facilities in the area. In addition, the Project will provide 11,325 square feet of non-required open space for the proposed tenants. This open space

includes the pocket courtyard, pocket patio, and the decks. The Project would not construct any recreational uses, nor does it include any residential uses that could increase park visitation in the area. **Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required.**

XVII. TRANSPORTATION

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

The following analysis summarizes and incorporates by reference the information provided in the *Transportation Assessment for Melrose & Seward Creative Office* (Transportation Assessment) prepared by Overland Traffic Consultants, Inc. dated April 2021. A Memorandum of Understanding (MOU) establishing the parameters for the Transportation Assessment was prepared and approved by the Department of Transportation ("LADOT") on March 2, 2021. An LADOT Assessment Letter was prepared on September 13, 2021. Both documents are available as Appendix H.1 and H.2, respectively to this IS/MND.

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the LADOT Transportation Impact Study Guidelines (TAG) which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The City has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects shall be evaluated for conformance with these City adopted transportation plans, programs, and policies. Per the TAG, a project would not be shown to result

in an impact merely based on whether a project would not implement a program, policy, or plan. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted programs, plans, and policies. The TAG provides a list of key City plans, policies, programs, and ordinances for consistency review. Projects that generally conform with and do not obstruct the City's development policies and standards addressing the circulation system, will generally be considered consistent. The Project's consistency with these plans, policies, programs, and ordinances is presented in Table 4.25, *Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies*.

Table 4.25
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
LA Mobility Plan 2035	Yes	Pursuant to the City of Los Angeles Mobility Plan 2035, arterial roadways are designated as Boulevards and Avenues. Avenues may vary in their land use context, with some streets passing through both residential and commercial areas; the roadway standard for an Avenue II roadway is a right-of-way width of 86 feet and a roadway width of 56 feet. Non-arterial roadways connect arterial roadways to local residential neighborhoods or industrial areas. Non-arterial roadways are designated collector or local streets. The standard for a Local Street is a right-of-way width of 60 feet and a roadway width of 36 feet. North Seward Street is designated as a Local Street in the Mobility Plan 2035. Currently North Seward Street is dedicated to 50 feet in width and required to provide 60 feet. A 5-foot half street dedication and 3-foot roadway widening would typically be required of the Project. However, multiple existing and recently approved buildings along North Seward Street are built to the property line. As such, North Seward Street cannot be widened along these properties, negating continuity of roadway width should North Seward Street be widened along the Project Site only. In addition, West Melrose Avenue is designated as an Avenue II in the Mobility Plan 2035 and is currently dedicated to 80 feet in width. An Avenue II requires an 86-foot dedication. A 3-foot dedication would typically be required of the Project. However, a designated historic library building is located directly west of the Project Site on West Melrose Avenue. As such, West Melrose Avenue cannot not be widened in this area.	Yes

Table 4.25
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
		Accordingly, the Project is requesting a waiver of these dedications and improvements based on dedication being physically impracticable and not necessary to meet the City's future mobility needs.	
Plan for a Healthy LA	Yes	The Project would support Policy 5.7, Land Use Planning for Public Health and GHG Emission Reduction, by reducing single-occupant vehicle trips by its proximity to transit service and on-site amenities for the employees. The Project would not conflict with other policies in the Plan for Healthy LA.	No
Land Use Element of the General Plan (35 Community Plans)	Yes	The Project is in the Hollywood Community Plan area. The Project would be in substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.	No
Specific Plans	NA	The Project is not within a Specific Plan area.	No
LAMC Section 12.21 A.16 (Bicycle Parking)	Yes	The Project would, at a minimum, comply with the required short- and long-term bicycle parking pursuant to LAMC Section 12.21 A16.	No
LAMC Section 12.26 J (TDM Ordinance)	Yes	LAMC Section 12.26 J for Transportation Demand Management and Trip Reduction Measures applies to the construction of new non-residential floor area greater than 25,000 square feet. The Project will comply with this requirement.	No
LAMC Section 12.37 (Waivers of Dedication and Improvement)	Yes	A waiver of dedication and improvements is requested for North Seward Street and West Melrose Avenue based on dedications being physically impracticable and not necessary to meet the City's future mobility needs. The designated historic library building, immediately to the west, is built to the property on West Melrose Avenue, therefore West Melrose Avenue would not be improved in this area. Multiple existing and recently approved buildings along North Seward Street are built to the property line.	Yes
Vision Zero Action Plan	Yes	The Project would reduce the number of vehicle driveways at the site. Instead of the four existing driveways on North Seward Street, the Project would retain two existing for buildings to remain and construct one new one where there are currently two driveways. No driveways are proposed on West Melrose Avenue. The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.	No

Table 4.25
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
Vision Zero Corridor Plan	Yes	The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.	No
Citywide Design Guidelines			
Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.	Yes	The Project would create a continuous and straight sidewalk clear of obstructions for pedestrian travel. The Project would provide adequate sidewalk width and right-of-way that accommodates pedestrian flow and activity. Pedestrian access would be provided at street level with direct access to the surrounding neighborhood and amenities.	No
Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.	Yes	The Project complies with the Citywide Design Guidelines to incorporate vehicle access locations that do not discourage and/or inhibit the pedestrian experience. Vehicular access and parking would be located on the local street only. The Project vehicular access would comply with driveway location standards. No vehicular access would be provided on West Melrose Avenue.	No
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	Yes	The building design uses attractive architectural elements. The Project would not preclude or conflict with the implementation of future streetscape projects in the public right-of-way.	No

NA = not applicable
Source: Overland Traffic Consultants, Inc. April 2021.

As summarized above in Table 4.25, the Project would not conflict with the key City planning documents. North Seward Street is designated as a Local Street in the Mobility Plan 2035. Currently North Seward Street is dedicated to 50 feet in width and is required to provide 60 feet. A 5-foot half street dedication and 3-foot roadway widening would typically be required of the Project. However, multiple existing and recently approved buildings along North Seward Street are built to the property line. As such, North Seward Street cannot be widened along these properties, negating continuity of roadway width should North Seward Street be widened along the Project Site only. In addition, West Melrose Avenue is designated as an Avenue II and is currently dedicated to 80 feet in width. An Avenue II requires an 86-foot dedication. A 3-foot dedication would typically be required of the Project. However, a designated historic library building is located directly west of the Project Site on West Melrose Avenue. As such, West Melrose Avenue cannot not be widened in this area.

Accordingly, the Project is requesting a waiver of these dedications and improvements based on dedication being physically impracticable and not necessary to meet the City's future mobility needs. **Therefore, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian**

facilities and impacts would be less than significant and no mitigation measures would be required.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts.

LADOT's TAG establishes analysis methods and impact significance criteria to apply in the analysis of VMT effects associated with new land use projects. Specifically, Threshold T-2.1 asks whether the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts. To address this question, LADOT's TAG established potential impact criteria for residential, office, regional-serving, and other land use development projects and identified significant VMT impact thresholds for each of seven Area Planning Commission (APC) sub-areas in the City. The Project does not propose residential land uses and is not considered to be regional-serving. Because the Project is an office development project, per Section 2.2.3 of the TAG, the Project would have a potentially significant impact if it would generate work VMT per employee exceeding 15 percent below the existing average VMT per employee for the APC in which the Project is located. The Project is in the Central APC sub-area, which limits daily work VMT per employee to a threshold value of above 7.6 (15% below the existing VMT for the Central APC). The Project's daily work VMT per employee was calculated by the Transportation Assessment using the City's VMT Calculator Version 1.3. LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

As a project design feature (see **PDF TR-1** below), the Project proposes to reduce parking, provide a sufficient number of bicycle parking to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21 A.16 with 8 short-term bicycle parking spaces, 16 long-term bicycles spaces, and provide one shower for each gender and a total of 24 lockers on the P-1 Level of the parking facility. With implementation of PDF TR-1, the VMT Calculator estimated that the Project's daily work VMT per employee would be 8.4, exceeding the 7.6 threshold for the Central APC sub-area. As such, mitigation measure **MM TR-1**, which requires that the Project implement Transportation Demand Management strategies, is included below. Specific strategies required by **MM TR-1** include providing promotions and marketing materials for site-specific transportation options to employees, encouraging a minimum of 25 percent of employees to participate in alternative work schedules or telecommuting, and establishing a ride share program with measures to achieve a minimum of 10 percent employee eligibility. Following implementation of mitigation measure **MM TR-1**, the VMT Calculator estimated that the Project's daily work VMT per employee would be reduced to 7.6, which would not exceed the threshold for the Central APC sub-area. **Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) and impacts would be less than significant with mitigation.**

The following project design feature and mitigation measure is recommended to reduce traffic-related impacts to a less than significant level.

Project Design Features

PDF TR-1 The following Transportation Demand Management strategies will be incorporated into the Project design:

- REDUCED PARKING SUPPLY – This strategy changes the Project's parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC requirements without consideration of parking reduction permitted in the code. The Project is required to provide 172 parking spaces per code but will incorporate replacement of 4 parking by providing 4 bicycle parking spaces per vehicle parking space.
- BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC – This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 26 bicycle parking spaces.
- BICYCLE INFRASTRUCTURE – Include 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 the Project. This Project will provide up to two showers.

Mitigation Measures

MM TR-1 The Project shall incorporate the following Transportation Demand Management strategies as part of the ongoing Project operations:

- EDUCATION & 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 education and promotional materials, such as posters, information boards or a website with information that a traveler could choose to read at their own leisure. All employees will be included in this TDM strategy.
- COMMUTE TRIP REDUCTIONS – Alternative Work Schedules and Telecommute Program – This strategy encourages employees to work alternative schedules or telecommute, including staggered start times, flexible schedules, or compressed work weeks. A minimum 25% of the employees will be participating in this program.

- COMMUTE TRIP REDUCTIONS – Ride Share Program – This strategy increases vehicle occupancy by providing ride-share matching services, designated preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles and providing a website or message board to connect riders and coordinate rides. A minimum of 10% of the employees will be eligible.

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

Less Than Significant Impact. A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions.

Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a Project Site. A review of the Project Site plans was conducted to identify any hazardous geometric design features.

Vehicular access to all parking would be provided be from a new driveway on the local street of North Seward Street. No driveways would be introduced on W**est** Melrose Avenue, an Avenue II roadway. In addition, the Project would reduce the number of driveways currently on North Seward Street from four to three. By providing one less driveway, the Project would reduce the number of potential hazard points with pedestrians, cyclists, and other vehicles. Furthermore, the Project's local street access is consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design. With respect to pedestrian safety during construction, the Applicant shall plan construction and construction staging to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This would include adequate and safe pedestrian protection, such as physical separation from work areas and vehicular traffic, and overhead protection. Temporary pedestrian facilities would be adjacent to the Project Site and provide safe, accessible routes. Covered walkways would be provided where pedestrians are exposed to potential injury from falling objects to ensure the safety of pedestrians and other vehicles in general during construction. **Accordingly, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant.**

d) Would the project result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

Construction

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. The temporary closures would not be expected to substantially interfere with emergency response or evacuation plans.

To ensure limited interruptions due to construction activities, the Project includes project design feature **PDF TR-2** to ensure adequate circulation and emergency access through implementation of a Construction Traffic Control/Management Plan (CTM Plan) that will be approved by LADOT. The CTM Plan would minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. While it is expected that the majority of construction activities for the Project would primarily be confined onsite, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the LADOT-approved CTM Plan. Therefore, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. **As such the Project would not result in inadequate emergency access during construction and impacts would be less than significant.**

Operation

There are no hazardous design features included in the proposed vehicular design or site plan for the proposed Project that could impede emergency access. The proposed Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Melrose Avenue and Seward Avenue. Furthermore, the proposed Project would be subject to the plan review requirements of the LAFD pursuant to Section 118 of the Fire Code to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the proposed Project. **Therefore, the Project would not result in inadequate emergency access during operation and impacts would be less than significant.**

The following project design feature is recommended to reduce traffic-related impacts to a less than significant level.

Project Design Features

PDF TR-2 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (CTM Plan) to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The CTM Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CTM Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

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)?

Less Than Significant Impact. Assembly Bill 52 ("AB 52"), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources ("TCR") and establishes a formal notification and, if requested, consultation process for California

Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project.

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

Less Than Significant Impact. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

A records search prepared by the SCCIC did not yield any prior evaluations of the property (see Appendix B).[112] The SCCIC records search revealed that there have been no recorded archaeological resources within half-mile radius of the of the property (including the Project Site).

A Sacred Lands File Search was preformed, by the Native Heritage Commission which indicated negative results (see Appendix I.1).[113] As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

[112] *South Central Coastal Information Center, Records Search, July 12, 2021.*

[113] *Correspondence from Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, June 21, 2021.*

As lead agency, the City mailed letters to the ten listed Native American tribes included on the City's consultation list (see Appendix I.2). Letters were sent out to all contacts on June 24, 2021. The City did not receive any correspondence or request for consultation from the tribes.

Though unlikely, if present, any unidentified tribal cultural resources have the potential to be significant under CEQA. However, while the Project would not adversely affect known Tribal cultural resources, the City has established a standard condition of approval to address inadvertent discovery of Tribal cultural resources:

> In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), 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 Applicant 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; (2) and the Department of City Planning.
>
> - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
>
> - The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
>
> - The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
>
> - If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant 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 by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Therefore, impacts would be less than significant, and no mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

As detailed below in response to Question XIX(b), sufficient water supplies would be available to serve the Project and no new offsite lines would be required. Additionally, as discussed in

response to Question XV(a), no new hydrants are anticipated. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis.[114] The Project would require construction of new, on-site water distribution lines to serve the new building. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor offsite work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and including offsite connection to existing water lines. Therefore, the construction of new water facilities would not result in significant environmental effects. **Accordingly, impacts related to the construction of new water facilities would be less than significant and no mitigation measures would be required.**

Wastewater Facilities

As detailed below in response to Question XIX(c), the Project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities. During construction of the Project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. The Project would require construction of new on-site wastewater infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor offsite work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor offsite work along the Project frontage would be required in order to connect to the public main. All offsite work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures.[115] The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation, which would be a temporary action. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts

[114] *Correspondence from Charles C. Holloway, Manager of Environmental Planning and Assessment, Los Angeles Department of Water & Power, April 1, 2021.*

[115] *Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment, February 19, 2020.*

related to the construction of new wastewater facilities would be less than significant and no mitigation measures would be required.

Stormwater Drainage Facilities

Refer to Question c(iii) in Section X, Hydrology and Water Quality, above for a discussion of stormwater drainage facilities. As discussed there, BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the same location (discharges directly to West Melrose Avenue and North Seward Street) and drain to the same stormwater systems. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Accordingly, impacts related to the construction of new stormwater facilities would be less than significant and no mitigation measures would be required.

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP. Electricity demand during construction would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities.

As detailed in response to Question VI(a), the estimated electricity demand of the Project during operation would represent an insignificant percentage of the LADWP's projected annual sales.[116] Furthermore, as discussed in response to Question VI(a), the incorporation of the 2016 Title 24 energy conservation standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including electricity. As such, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Based on the above, the construction of new on-site electric power distribution facilities would not result in significant environmental effects and the expansion of off-site electric power sources

[116] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

would not be required. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. However, the Project would require construction of new on-site gas distribution lines to serve the new building and connection to the existing off-site natural gas facilities. The Project would connect to existing natural gas facilities in coordination with and under the supervision of SoCalGas. Construction activities typically do not involve the consumption of natural gas. Accordingly, there would be no demand generated by construction and no new natural gas facilities would be required.

As detailed in response to Question VI(a), the estimated natural gas demand of the Project during operation would represent an insignificant percentage of the forecasted consumption of natural gas in SoCalGas' planning area. Furthermore, as discussed in response to Question VI(a), the incorporation of the 2016 Title 24 energy conservation standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including natural gas. As such, it is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand.

Based on the above, the construction of new on-site electric power facilities would not result in significant environmental effects and the expansion of off-site natural gas sources would not be required. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, Project impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.

Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant and no mitigation would be required.

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft.

The LADWP's *2015 Urban Water Management Plan* water demand projection for 2040 is approximately 675,700 af/y for average years, 709,500 af/y for single-dry years, and 709,500 af/y for multiple-dry years. As shown in Table 4.26, *Estimated Daily Water Consumption*, below, the Project would consume a net increase of approximately 8,227gpd (9.2 af/y) of water. This amount would represent approximately 0.0014 percent of the water supply in 2040 in average years and 0.0013 percent of the water supply in single-dry and multiple-dry years. Furthermore, the above projections are considered to be conservative as the Bureau of Sanitation generation rates used to calculate the Project's estimated water consumption do not account for any water conservation features required by local and State policies and regulations. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2, the Project would be required to implement water saving features to reduce the amount of water used by the Project, including, high efficiency toilet and urinals and low flow faucets. All fixtures would be required to meet applicable flush volumes and flow rates. In addition, the Project would be prohibited from using single-pass cooling systems. Compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, would further reduce the above projected water demand below the sewage generation factors assumed by the City's Bureau of Sanitation.

Consideration of existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2040. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.[117] Therefore, the amount of new annual demand from the Project would be insignificant relative to available supplies through 2040, projected growth in Los Angeles, and planned water resource development by LADWP. Moreover, the Project's land uses, density,

[117] *City of Los Angeles Department of Water and Power, Urban Water Management Plan 2015, June 7, 2016.*

Table 4.26
Estimated Daily Water Consumption

Land Use	Size	Consumption Rate[a] (gpd)	Total Consumption (gpd)	Total Consumption (af/y)[b]
Office	67,242 sf	120/1,000 sf	8,069	9.0
Retail	674 sf	25/1,000 sf	16	0.02
Open Space	11,325 sf	50/1,000 sf	566	0.6
Total Project Water Consumption			8,651	9.7
Less Existing Water Consumption[b]			*424*	*0.47*
Net Total Water Consumption			**8,227**	**9.2**

Notes: gpd = gallons per day; af/y = acre-feet per year; sf = square feet
[a] *Consumption rate based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.*
[b] *Totals may be off due to rounding.*
[c] *Existing consumption was determined based on 100 percent of the City of Los Angeles Bureau of Sanitation sewerage generation factor.*
Source (table): EcoTierra Consulting, 2021.

and intensity would be consistent with the General Plan/Community Plan's land use designation, and the increased water demand as a result of the Project would be accounted for in the 2015 UWMP. As such, the Project's estimated water demand would be within overall LADWP projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2015 UWMP.

Therefore, based on the above, sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. **Accordingly, impacts related to water supply would be less than significant and no mitigation measures would be required.**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

The City's Bureau of Sanitation provides sewer service to the Project area. The Project Site currently has existing sewer connections to the City's sewer system. Sewage from the Project site is conveyed via 14-inch concrete sewer pipe in North Seward Street, and 27-inch, 30-inch, and 36-inch concrete sewer pipes in West Melrose Avenue to the Hyperion Water Reclamation Plant (HWRP).[118] Recent data on the HWRP website indicates that on average 275 million

[118] *Correspondence, Ali Poosti, Division Manager, City of Los Angeles, Wastewater Engineering Services Division, LA Sanitation and Environment, March 4, 2021.*

gallons of wastewater enters the HWRP on a dry weather day.[119] Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.[120] Accordingly, there is a residual dry weather day capacity of 175 mgd, or 39 percent of the total. There is also a peak weather flow remaining capacity of 250 mgd, 31 percent of the total.

The type and amount of wastewater that would be generated by the Project would be typical for the types of office and retail spaced proposed for the Project Site. Estimated wastewater generation for the Project is presented below in Table 4.27, *Estimated Average Daily Wastewater Generation*. As shown, the Project would generate approximately 8,277 net gpd (0.007 mgd) of wastewater. This amount would represent approximately 0.0016 percent of the remaining daily capacity at the Hyperion Treatment Plant (HTP). Therefore, the HTP has adequate capacity to serve the Project's demand in addition to its existing commitments and the Project would not require the construction of new or expanded wastewater treatment facilities. Furthermore, as with the projections of water demand detailed above, the estimated wastewater generation is a conservative estimate as the Bureau of Sanitation generation rates do not account for water conservation features that would reduce the amount of the Project's water usage and, therefore, resulting conveyance into the wastewater distribution and treatment system. **Accordingly, impacts related to wastewater treatment capacity would be less than significant and no mitigation measures would be required**.

Table 4.27
Estimated Average Daily Wastewater Generation

Land Use	Size	Generation Rate[a]	Total Wastewater Generated (gpd)
Office	67,242 sf	120/1,000 sf	8,069
Retail	674 sf	25/1,000 sf	16
Open Space	11,325 sf	50/1,000 sf	566
Total Project Wastewater Generation			8,651
Less Existing Wastewater Generation			*424*
Net Total Wastewater Generation			**8,227**

Notes: du = dwelling units; gpd = gallons per day; sf = square feet
[a] *Generation rate based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.*
[b] *Totals may be off due to rounding.*
[c] *Existing generation was determined based on 100 percent of the City of Los Angeles Bureau of Sanitation sewerage generation.*
Source (table): EcoTierra Consulting, 2021.

[119] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant Website, accessed: March 2021.*

[120] *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant Website, accessed: March 2021.*

d) Would the project generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the City is serviced by the Sunshine Canyon Landfill. The landfill accepts residential, commercial, and construction waste. Solid waste from the Project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers. The average daily intake of the Sunshine Canyon Landfill is approximately 7,582 tons and the permitted daily intake is 12,100 tons per day.[121]

Construction of the Project would generate construction and demolition waste. Demolition waste would consist primarily of debris from the demolition of the existing 8,473-square-foot building that would be disposed of as inert waste and is estimated to total approximately 733 tons.[122] Construction of the Project building is estimated to generate a total of approximately 16.48 tons of solid waste.[123] This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As required by City Ordinance No. 181,519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Management Plan 2017 Annual Report* concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.[124] Therefore, the Project-generated demolition debris of 733 tons and construction waste of 16.48 tons would represent a very small percentage of the inert waste disposal capacity in the region.

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[121] *California Integrated Waste Management Board, Solid Waste Information System, Facility/Site Summary Details Website, accessed March 2021.*

[122] *A demolition waste generation rate of 173.00 pounds per square foot was used. 8,473 square feet of demolition multiplied by 173.00 pounds is 1,465,829 pounds (733 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998.*

[123] *A construction waste generation rate of 3.89 pounds per square foot for nonresidential construction was used. 8,473 square feet of nonresidential construction multiplied by 3.89 pounds is 32,960 pounds (16.48 tons). Source: USEPA Report No. EPA A530-98-010, Characterization of building Related Construction and Debris in the United States, July 1998.*

[124] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2017 Annual Report, April 2019, Appendix E-2, Table 1.*

During operation, the Project would generate solid waste that is typical of a creative office building use and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in Table 4.28, *Project Estimated Daily Solid Waste Generation*, the Project would generate approximately 7,497 pounds per day of net solid waste. As discussed below in response to Question XIX(e), AB 939 was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is assumed that the Project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills. Nonetheless, it is conservatively assumed that all 7,497 pounds per day of the Project's solid waste would be disposed of at regional landfills. The Sunshine Canyon Landfill's permitted daily intake of 12,100 tons per day would have capacity to accept the net daily operational waste generated by the Project under the existing permitted amount. Therefore, the Project would not generate solid waste in excess of state and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **Accordingly, impacts related to solid waste and solid waste reduction goals would be less than significant and no mitigation measures would be required.**

Table 4.28
Project Estimated Daily Solid Waste Generation

Land Use	Size	Employees	Generation Rate (pounds/employee/day)[a]	Total Generation (pounds/day)
Office	67,242 sf	274	10.53	7,813
Retail	674 sf	2	10.53	21
Open Space	11,325 sf	0	0	0
			Total Project Solid Waste Generation	7,834
			Less Existing Solid Waste Generation[b]	*337*
			Net Solid Waste Generation	**7,497**

Notes: sf = square feet
[a] *Source: City of Los Angeles CEQA Thresholds, 2006, accessed: May 2021.*
[b] *Source: C City of Los Angeles CEQA Thresholds, 2006, accessed: May 2021.*
Source (table): EcoTierra Consulting, 2021.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated onsite by the project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

Consistency with California Integrated Waste Management Act of 1989

The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's net total solid waste generated (7,497 pounds per day) must be recycled rather than disposed of in a landfill. The Project would be required to comply with AB 939 requirements and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would also be required to comply with the Bureau of Sanitation Solid Resources Infrastructure Facility Plan to reduce the amount of solid waste being disposed into landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Therefore, the Project would not substantially increase solid waste generation in the City or the amount disposed into the landfills. Accordingly, the Project would be consistent with AB 939.

Consistency with the City of Los Angeles General Plan Framework Element

The Framework Element of the City of Los Angeles General Plan also supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[125] The Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The Project would include enclosed trash areas and recycling storage areas and divert 50 percent of the construction waste debris away from landfills. The Project would be consistent with the City of Los Angeles General Plan Framework goal of maximizing source reduction and materials recovery, and minimizing the amount of waste requiring disposal. Therefore, the Project would be consistent with the Framework Element.

Consistency with City of Los Angeles Zero Waste Plan

The City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The Zero Waste Plan aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g. adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multi-family and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities new policies and programs, and the development of future recycling facilities.[126] The Project would include enclosed trash areas and recycling storage areas and would divert construction waste debris away from landfills. The

[125] *Los Angeles Department of City Planning, Citywide General Plan Framework, 1996, page 9-11.*

[126] *Los Angeles Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, https://www.lacitysan.org/san/ sandocview?docname=cnt012522. Accessed January 13, 2022.*

Project would be also be consistent with the City's Zero Waste Plan goal of minimizing the amount of waste requiring disposal through green bin recycling program. Therefore, the Project would be consistent with the City's Zero Waste Plan.

Consistency with the Los Angeles Municipal Code

The LAMC requires a project to be designed to incorporate a recycling area or room.[127] The Project would be required to comply with this requirement and have sufficient containers to accommodate the amount of solid waste and recycling generated by the premises, and landscape waste would be placed in designated green waste bins. Therefore, the Project would be consistent with the LAMC.

Therefore, based on the above, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

[127] *Los Angeles Municipal Code, Section 12.21.A.19.c.*

XX. WILDFIRE

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

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The Project Site is located near La Brea Avenue, a designated secondary disaster route, which may be utilized for an evacuation route during an emergency.[128] The Project constitutes a private development located on private land and does not propose alteration to the public rights-of-way. No full road closures along Melrose Avenue or La Brea Avenue during construction are anticipated. However, if lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Project would comply with access

[128] *Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

requirements from the LAFD and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required**.

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

No Impact. A significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire. The Project Site is located within a highly developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,[129] nor is the Project Site or surrounding area within a wildland fire hazard area.[130] Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. **Accordingly, no impact would occur and no mitigation is required.**

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 risks or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. The Project would involve the demolition of an existing building and construction of a new building in a highly urbanized area in the Hollywood community of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. **Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant and no mitigation measures are required.**

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 stability, or drainage changes?

No Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes. The Project would be required to comply with all

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[129] *City of Los Angeles Department of City Planning, Zone Information & Map Access System.*

[130] *City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996.*

developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for fire at the Site. Any installation of on-site power lines required to provide the Project with electricity and connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity is relatively flat with no major slopes that would be susceptible to flooding or landslide are located nearby. **Accordingly, the Project would not expose people or structures to such hazards and impacts would be less than significant.**

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

No Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

The Project is located in an urbanized area and would have no significant and unavoidable impacts with respect to biological resources or cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. **Therefore, no impact would occur and no mitigation measures are required.**

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely Related Projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

There are six Related Projects as shown in Table 4.29, *List of Related Projects*, in the general vicinity of the Project Site that were identified in the Project's Traffic Assessment. None of these are within direct vicinity of the Project Site (i.e., within 500 feet). The nearest Related Projects include: No. 4, apartments, approximately 932 feet (0.18 miles) west of the Project Site. The rest of the related projects are greater than 1,000 feet away, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the Project Site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of the Related Projects is expected to occur in accordance with adopted plans and regulations. As per ZI No. 2145 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." **Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.**

Table 4.29
List of Related Projects

No.	Project Location	Land Use	Size	Miles From The Project Site
1	956 Seward St	Office	130,000 sf	0.4 mile
2	6601 W Romain St	Hollywood Center Studios Office Storage	104,155 sf 1,970 sf	0.4 mile
3	859 Highland Av	Restaurant	806 sf	0.5 mile
4	707 N Cole Av	Apartments	84 du	0.18 mile
5	901 Vine St	Apartments Restaurant Retail	85 du 4,000 sf 4,000sf	0.6 mile
6	6535 Melrose Av	Apartments Restaurant Retail	33 du 2,635 sf 2,321 sf	0.3 mile

Notes:
sf = square feet
du = dwelling units
Source: Overland Traffic Consultants, Inc., Traffic Assessment for Melrose and Seward Creative Office, April 2021.

Agriculture and Forestry Resources

Development of the Project in combination with the Related Projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts and no cumulative impacts to agricultural or forestry resources would occur.**

Air Quality

Cumulative projects include local development as well as general growth within the Project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area.

The Project area is out of State attainment for both ozone and particulate matter (PM_{10} and $PM_{2.5}$). Because the South Coast Air Basin is currently in nonattainment for PM_{10} and $PM_{2.5}$, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from

individual projects that exceed the project-specific thresholds of significance identified above to be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As discussed above, the maximum mass daily regional construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and would not be cumulatively considerable. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts and cumulative air quality emissions would be less than significant.**

As with the Project, construction of the related projects is expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, similar to the Project, the related projects are also required to comply with SCAQMD Rule 402, and these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. **Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.**

Biological Resources

The Project would not impact any protected trees. The Project would have no impact upon biological resources. Development of the Project in combination with the Related Projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the Related Projects would be subject to the City of Los Angeles Protected Tree Ordinance. The Related Projects have no habitats, as they are infill developments. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to biological resources will be less than significant.**

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in

the area. The Project will have no impact on a historic resource and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resource will be less than significant.**

Energy

Each of the Related Projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each Related Projects would be required to be in compliance with Title 24 of the California Code of Regulations (CCR) (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each Related Projects would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure. Finally, each Related Projects would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Related Projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative energy impacts would be less than significant.**

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a**

cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

A cumulatively considerable impact would occur where the impact of the Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. **Given that the analysis above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would also be considered less than significant.**

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.**

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the Related Projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each Related Project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3⁄4 inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative water quality impacts would be less than significant.**

Land Use and Planning

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all Related Projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. **The Project would not make a cumulatively considerable contribution to land use planning, and cumulative land use impacts would be less than significant.**

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative impacts to mineral resources would occur.**

Noise

Construction Noise

For construction noise impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 500 feet or more away from another site then noise levels would have attenuated to a point that they would not combine to produce a cumulative noise impact. The nearest Related Projects include: No. 4, apartments, approximately 932 feet (0.18 miles) west of the Project Site. **Therefore, construction noise would not combine to result in a cumulatively considerable construction noise impact.**

Operational Noise

Similar to construction noise, it is unlikely for stationary noise sources to result in a cumulatively considerable noise impact, unless related projects are located within the close vicinity of the Project. The nearest Related Projects include: No. 4, apartments, approximately 932 feet (0.18 miles) west of the Project Site and operational stationary noise would not combine to create a cumulatively considerable stationary noise impact. For operational/roadway related noise impacts, the traffic study accounted for trip generation from related projects which was used to model mobile noise levels. No mobile noise impacts have been identified. **Therefore, a cumulatively considerable noise impact would not occur related to operational noise.**

Construction Vibration

For construction vibration impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 50 feet or more away from another site, vibration levels would have attenuated to a point that they would not combine to produce a

cumulative vibration impact. The nearest Related Projects include: No. 4, apartments, approximately 932 feet (0.18 miles) west of the Project Site. **Construction vibration levels would not combine to result in a cumulatively considerable construction vibration impact.**

Operational Vibration

Urban infill developments do not typically generate significant operational vibration levels. Related Project and Project vehicle trips could generate vibration, although similar to the existing condition, roadway vibration from passenger vehicles would not be perceptible outside of the roadway right-of-way. A significant operational vibration impact would not occur. **Therefore, operational vibration levels would not combine to result in a cumulatively considerable vibration impact.**

Population and Housing

The Related Projects would introduce additional residential and other related uses to the City of Los Angeles. Any residential Related Projects would result in direct population growth. The Related Projects growth would not exceed the projected growth because SCAG can update its projections after the 2020 Census when some of the Related Projects are in operation. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. **Because the Project would not displace any residents, the Project's population growth would not be cumulatively considerable**. **Therefore, the Project's cumulative impacts to population and housing would be less than significant.**

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by Fire Station No. 27 the same as the Project Site.[131] The Project, in combination with the Related Projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and Related Projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any Related Projects that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to

[131] *City of Los Angeles Fire Department, Find Your Station Website, accessed: May 2021.*

further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and as such cumulative impacts on fire protection would be less than significant.**

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the Related Projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the Related Projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.**

Schools

Given the geographic range of the related projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. These related projects would have the potential to generate students that would attend the same schools as students associated with the Project. However, each of the related projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Overall, the payment of school fees in compliance with SB 50 would provide full and complete mitigation of school impacts for the purposes of CEQA. **Therefore, the Project's school impacts would not be cumulatively considerable, and cumulative impacts on schools would be less than significant.**

Parks and Recreation

Development of the Project in conjunction with the Related Projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would

contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential Related Projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential Related Projects would also be required to comply with the on-site open space requirements of the LAMC. **Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.**

Library

Given the geographic range of the Related Projects, they would be served by John C. Fremont Branch Library, and Will & Ariel Durant Branch Library.[132] Development of the Related Projects would likely generate additional demands upon library services. The LAPL has no plans for new or expanded libraries; however, the Related Projects, like the Project, would contribute to the City General Fund, which goes to, among other things, library services. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and impacts related to library facilities would be less than significant.**

Transportation

Conflict with Program Plans

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the Related Projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity. Therefore, the Project, together with the Related Projects identified in Table 4.29, would neither create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Therefore, Project operation-related and cumulative-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and Project transportation policy impacts would be less than significant.**

VMT Analysis

A development project would have a cumulative VMT impact if it were deemed inconsistent with 2020-2045 RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction

[132] *LAPL Locations, June 2021.*

targets. However, based on the TAG, a project that does not result in a significant VMT impact would be in alignment with the RTP/SCS and therefore, would not result in a cumulative VMT impact. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project would not result in a significant cumulative VMT impact.**

Hazards Due to Geometric Design

The TAG indicates that cumulative impacts for this threshold requires a review of related projects with access points proposed along the same block(s) as a proposed project in order to determine the combined impact and the proposed project's contribution. None of the Related Projects identified in the Traffic Impact Assessment, and provided in Table 4.29, provide access along the same block as the Project. Thus, Related Projects and the Project would not increase hazards due to geometric design features. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative Geometric Design impact.**

Emergency Access

Vehicular access to the Project Site would be provided via a two-way entry/ exit driveway on North Seward Street. The Project will also include an at-grade onsite drop-off area to serve both rideshare arrivals/departures and onsite valet parking operations. The existing four-foot easement on the west side of the Project Site will be expanded to provide a five-foot setback that will provide one of the project's required exits to West Melrose Avenue. None of the Related Project sites are located within 500 feet of the Project Site and each has access to streets other than North Seward Street. Thus, the Project and related projects would not generate vehicle trips that would threaten the ability of emergency vehicles to access land uses in the project area. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative emergency access impact.**

Tribal Cultural Resources

The Project and Related Projects would comply with AB 52 in which the lead agency for each project would be required to notice tribes that are traditionally and culturally affiliated with the geographic area of the related project sites if the tribe has submitted a written request to be notified. Due to being locally specific, each Related Project would need to conduct a Sacred Lands File search and be evaluated within its own site specific context. The Project would not adversely affect known Tribal Cultural Resources. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resources will be less than significant.**

Utilities and Service Systems

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. Demands on water

consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant. Ultimately, the wastewater and water facilities HTP and Los Angeles Aqueduct Filtration Plant (LAAFP) and Sunshine Canyon landfill have adequate capacity to accommodate the project and Related Projects along with the general growth within the City.[133] It is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Related Projects like Project, electricity demand. It is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand**.** Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. **Therefore, the Project's contribution to cumulative wastewater, water, solid waste, electricity, natural gas, and telecommunications impacts will not be cumulatively considerable and cumulative impacts would be less than significant.**

Wildfire

No related project is located within 500 feet of the Project Site and do not share access to North Seward Street. If lane closures are necessary to local streets adjacent to Related Project sites, travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Related Projects, like the Project, would comply with access requirements from the LAFD and would not impede emergency access within the vicinity of each Related Project site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Cumulative impacts related to the implementation of the City's emergency response plan would be less than significant**.

All of the Related Project Sites and the Project Site are within urbanized areas of the City and do not include wildlands or fire hazard terrain or vegetation. Therefore, the Project and Related would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative wildfire impact would occur.**

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Mitigation is required to

[133] *The Countywide Integrated Management Plan 2017 Annual Report concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.*

reduce, construction noise/vibration (**MM NOI-1 - MM NOI-3**), and traffic construction and VMT (**MM TR-1 and MM TR-2**). Thus, with mitigation, any potentially significant impacts to humans would be less than significant.

INITIAL STUDY

5 MITIGATION AND MONITORING PROGRAM

5.1 INTRODUCTION

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

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

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

5.2 ORGANIZATION

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

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.

- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

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

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

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5.4 PROGRAM MODIFICATION

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

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

MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5.5 MITIGATION MONITORING PROGRAM

Noise

Mitigation Measures

MM NOI-1 During all Project Site demolition, grading/excavation, foundation and building construction, the construction contractors shall install a temporary, continuous sound barrier along the western boundary of the Project Site. The barrier shall be tall enough to break the line-of-site between construction activity and the adjacent library and residential use, and be constructed of materials achieving a Transmission Loss (TL) value of at least 14 dBA, such as ½ inch plywood.[134] The supporting structure shall be engineered and erected according to applicable codes.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

MM NOI-2 The construction contractor shall avoid using large bulldozer or caisson drill within 80 feet of the façade of the residential use located west of the Project Site at 716 North June Street and within 63 feet of the façade of the John C. Fremont Branch Library located west of the Project Site.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

MM NOI-3 The construction contractor shall avoid using large bulldozers or caisson drills within 15 feet of the buildings directly adjacent to the Project boundaries.

- **Enforcement Agency:** Department of Building and Safety

[134] *Based on the FHWA Noise Barrier Design Handbook (July 14, 2011), see Table 3, Approximate sound transmission loss values for common materials; ½ inch plywood has a transmission loss of 20 dBA.*

- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

Traffic

Project Design Features

PDF TR-1 The following Transportation Demand Management strategies will be incorporated into the Project design:

- REDUCED PARKING SUPPLY – This strategy changes the Project's parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC requirements without consideration of parking reduction permitted in the code. The Project is required to provide 172 parking spaces per code but will incorporate replacement of 4 parking by providing 4 bicycle parking spaces per vehicle parking space.

- BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 26 bicycle parking spaces.

- BICYCLE INFRASTRUCTURE – Include 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 the Project. This Project will provide up to two showers.

  - **Enforcement Agency:** Department of Building and Safety
  - **Monitoring Agency:** Department of Building and Safety
  - **Monitoring Phase:** During Project Design and Prior to Construction
  - **Monitoring Frequency:** Review of Plans
  - **Action Indicating Compliance:** Department of Building and Safety sign-off

PDF TR-2 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (CTM Plan) to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The CTM Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CTM Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** During Project Design and Prior to Construction
- **Monitoring Frequency:** Review of Plans
- **Action Indicating Compliance:** LADOT sign-off

Mitigation Measures

MM TR-1 The Project shall incorporate the following Transportation Demand Management strategies as part of the ongoing Project operations:

- EDUCATION & 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 education and promotional materials, such as posters, information boards or a website with information that a traveler could choose to read at their own leisure. All employees will be included in this TDM strategy.

- COMMUTE TRIP REDUCTIONS – Alternative Work Schedules and Telecommute Program – This strategy encourages employees to work alternative schedules or telecommute, including staggered start times, flexible schedules, or compressed work weeks. A minimum 25% of the employees will be participating in this program.

- COMMUTE TRIP REDUCTIONS – Ride Share Program – This strategy increases vehicle occupancy by providing ride-share matching services, designated preferred parking for ride-share participants, designing adequate passenger loading/unloading and waiting areas for ride-share vehicles and providing a website or message board to connect riders and coordinate rides. A minimum of 10% of the employees will be eligible.

  - **Enforcement Agency:** Department of Building and Safety
  - **Monitoring Agency:** Department of Building and Safety
  - **Monitoring Phase:** During Project Design and Prior to Construction
  - **Monitoring Frequency:** Review of Plans
  - **Action Indicating Compliance:** LADOT sign-off

INITIAL STUDY

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INITIAL STUDY

7 ABBREVIATIONS & ACRONYMS

AB	Assembly Bill
ADT	Average daily trip rate
ANSI	American National Standard Institute
APC	Area Planning Commission
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BACM	Best Available Control Measures
BMPs	Best Management Practices
BOE	Bureau of Engineering
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CCR	California Code of Regulations
C&D	Construction and Demolition
CEQA	California Environmental Quality Act
CF	Cubic Feet
CH_4	Methane
CHRIS	California Historical Resources Information System

City	City of Los Angeles, California
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Exposure
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
CTM	Construction Traffic Control/Management Plan
CY	Cubic Yards
CWC	California Water Code
dBA	Decibel
EF	Emission Factor
EIA	U.S. Energy Information Administration
EMFAC	Emission Factor
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
FAA	Federal Aviation Administration
FAR	Floor-to-area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	Greenhouse gas(es)
GPM	Gallons Per Minute
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan

GWH	Gigawatt
GWP	Global Warming Potential
HFCs	Hyrdofluorcarbons
H_20	Water Vapor
HQTA	High Quality Transit Areas
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
ITE	Institute of Transportation Engineers
kWh	Kilowatt Hours
LAAFP	Los Angeles Aqueduct Filtration Plant
LACC	Los Angeles County Code
LACDPW	Los Angeles County Department of Public Works
LADBS	City of Los Angeles Department of Building and Safety
LADWP	City of Los Angeles Department of Water and Power
LADOT	City of Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	City of Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LCFS	Low Carbon Fuel Standard
LEQ	Average Sound Level
LOS	Level of Service
LID	Low Impact Development

HWRP	Hyperion Water Reclamation Plant
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MMP	Mitigation Monitoring Program
MOU	Memorandum of Understanding
MPOs	California Metropolitan Planning Organizations
MS4	Municipal Separate Storm Sewer System
MTA	Metropolitan Transportation Authority
$MTCO_2e$	Metric Tons Carbon Dioxide Equivalents
MRZ	Mineral Resource Zone
MW	Megawatts
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standard
NFPA	National Fire Protection Association
NHSTA	National Highway Traffic Safety Administration
NPDES	National Pollution Discharge Elimination System
N_2O	Nitrous Oxide
NO_x	Nitrogen Oxides
OES	Obstruction Evaluation Service
OFFROAD	Off Road
OHP	California Office of Historic Preservation
OS	Open Space
PCBs	Polychlorinated Biphenyls
pCi/L	picoCuries per Liter
PDF	Project Design Feature

PFCs	Perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resource Code
PSI	Pounds Per Square Inch
RCPG	Regional Comprehensive Plan and Guides
REC	Recognized Environmental Conditions
RMS	Root Mean Square
ROG	Reactive Organic Gas
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	The South Central Coastal Information Center
SF_6	Sulfur Hexafluoride
SGMA	Sustainable Groundwater Management Act
SHRC	State Historic Resources Commission
SoCalGas	Southern California Gas Company
SO_x	Sulfur Oxides
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Program

SWRCB	State Water Resources Control Board
SWQDv	Stormwater Quality Design Volume
TAC	Toxic Air Contaminants
TAG	Traffic Assessment Guidelines
TCR	Tribal Cultural Resources
TMDL	Total Maximum Daily Load
TL	Transmission Loss
USEPA	U.S. Environmental Protection Agency
UWMP	Urban Water Management Plan
V/C	Volume to Capacity Ratio
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
ZEV	Zero Emission Vehicle
ZI	Zoning Information
ZIMAS	City of Los Angeles Zoning Information and Map Access System